

## 9.0 RESPONSES TO COMMENTS

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### 9.1 FINAL PEIR PROCESS

The Draft Program EIR (PEIR) was submitted to the State Clearinghouse Office of Planning and Research and circulated for public review beginning on December 9, 2019, and ending on January 24, 2020 (SCH # 20199011061) and a Notice of Completion was posted with each of the County Clerks for the six counties in the SCAG region and distributed to various federal, state, regional, and local government agencies, and other interested agencies, organizations, and individuals. The PEIR was circulated primarily using electronic mail to more than 2,700 interested parties. The PEIR was mailed directly to approximately 200 interested parties, including federal, state, regional and local agencies, organizations and major libraries in the region using the U.S. Postal Service certified mail service. Additionally, SCAG placed copies of the Draft PEIR at the offices of SCAG and electronic copies at the 56 public libraries throughout the region and posted the Draft PEIR on its website.

The PEIR was available at the following SCAG Regional Office locations:

SCAG Main Office  
900 Wilshire Boulevard, Suite 1700,  
Los Angeles, CA 90017

SCAG Riverside County Regional Office  
3403 10th Street, Suite 805  
Riverside, CA 92501

SCAG Imperial County Regional Office  
1405 N. Imperial Avenue, Suite 1  
El Centro, CA 92243

SCAG San Bernardino County Regional Office  
1170 West 3rd Street, Suite 140  
San Bernardino, CA 92410

SCAG Orange County Regional Office  
600 South Main Street, Suite 906  
Orange, CA 92868

A public workshop was held regarding the Connect SoCal Plan (“Plan”) Draft PEIR on January 9, 2020 from 2:00 pm to 3:30 pm at SCAG’s Los Angeles Office located at 900 Wilshire Boulevard, Suite 1700. This workshop was also a webinar which was available for the public via internet.

The Draft PEIR was made available for public review at the above-referenced locations until January 24, 2020, for a period of 46 days (December 9, 2019–January 24, 2020). A total of 52 comment letters were received by SCAG during the comment period. Among the 52 comment letters, there were 262 unique comments directly related to the Draft PEIR.<sup>1</sup>

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<sup>1</sup> SCAG received a total 327 comments, 66 of which were considered redundant (i.e, cross-referencing comments from other local jurisdictions or agencies).

This section of the EIR contains a summary of the distribution process for the Draft EIR and a listing of the parties that provided comments during the public review period. The commenters are divided into the following categories:

1. Sovereign Nations
2. Federal Agencies
3. State Agencies
4. Regional Agencies
5. Subregional Agencies
6. County Transportation Commissions
7. Organizations
8. Individuals

**Table 9.0-1, List of Commenters on the Draft PEIR**, provides a list of the comment letters received in response to the Draft PEIR.

**Table 9.0-1  
List of Commenters on the Draft EIR**

<b>Sovereign Nations</b>	
SOV-1	Santa Ynez Band of Chumash Indians
SOV-2	San Manuel Band of Mission Indians
<b>Federal Agencies</b>	
FED-1	Environmental Protection Agency
<b>State Agencies</b>	
STA-1	State of California, California State Transportation Agency
STA-2	California High-Speed Rail Authority
<b>Regional Agencies</b>	
REG-1	John Wayne Airport / Orange County
REG-2	South Coast Air Quality Management District
REG-3	Ventura County Air Pollution Control District
<b>Subregional Agencies</b>	
SUB-1	Orange County Council of Governments
<b>County Transportation Commission</b>	
TRANS-1	Los Angeles County Metropolitan Transportation Authority
TRANS-2	Orange County Transportation Authority
TRANS-3	San Bernardino County Transportation Authority & San Bernardino Council of Governments
TRANS-4	Transportation Corridor Agencies

<b>Local Jurisdictions</b>	
LOC-1	County of Los Angeles Department of Parks and Recreation
LOC-2	County of Ventura Resource Management Agency
LOC-3	Ventura County Public Works Watershed Protection Division
LOC-4	City of Costa Mesa
LOC-5	City of Huntington Beach
LOC-6	City of Indio
LOC-7	City of Irvine
LOC-8	City of La Habra
LOC-9	City of Laguna Hills
LOC-10	City of Lancaster
LOC-11	City of Los Angeles
LOC-12	City of Mission Viejo
LOC-13	City of Moreno Valley
LOC-14	City of South Pasadena
LOC-15	City of West Hollywood
LOC-16	City of Yorba Linda
<b>Organizations</b>	
ORG-1	Coalition for a Safe Environment, et al.
ORG-2	Sierra Club Pomona Valley
ORG-3	Sierra Club Moreno Valley
ORG-4	The Two Hundred
ORG-5	Westwood South of Santa Monica Blvd Homeowner's Association
ORG-6	Alliance for a Regional Solution to Airport Congestion
ORG-7	BizFed
ORG-8	Center for Biological Diversity
ORG-9	Center for Demographic Research
ORG-10	Climate Resolve
ORG-11	Keep Nuevo Rural
ORG-12	UNITE HERE Local 11
ORG-13	Southern California Leadership Council
ORG-14	Service Employees International Union
ORG-15	Bolsa Chica Land Trust
ORG-16	Friends of Harbors, Beaches, and Parks
ORG-17	Sierra Club Save Hobo Alisa Task Force
ORG-18	California Cultural Resource Preservation Alliance
<b>Individuals</b>	
IND-1	Marven Norman
IND-2	Albert Perdon
IND-3	Henry Fung
IND-4	Jordan Sisson
IND-5	Stephanie Johnson and Ghassan Roumani

The responses to comment letters are provided in the front portion of this document with original bracketed comment letters following at the end. For the purposes of identifying and responding to comments on the Draft PEIR, individual letters are numbered as shown in **Table 9.0-1** (top right-hand corner of the first page of each letter) and the individual comments within each letter are assigned a bracketed comment number. For example, the first comment in the comment letter from the U.S. EPA is labeled **Comment FED 1-1**.

Where responses result in a change to the EIR text, table or graphic, the response indicates that a change is made and where the change is made, and the resulting change is identified in **Chapter 10.0, Corrections and Additions**. Chapter 10 shows additions to text in underline and deletions in ~~striketrough~~ format. Where a new graphic or table is entirely new the information is not underlined as new, but rather the Final PEIR indicates that the table information is being replaced. The Final PEIR including all comment letters is available online along with the rest of the PEIR at: <https://www.connectsocal.org/Pages/Final-2020-PEIR.aspx>.

Several commenters on the Connect SoCal PEIR indicated in the subject line of their letter that they were providing comments on the Draft PEIR but the substance of their letter included comments on both the Draft PEIR and Connect SoCal or comments only on Connect SoCal. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15088(a), SCAG is required to evaluate and address only those comments on environmental issues received from public agencies and other interested parties who reviewed the Draft PEIR. SCAG recognizes the importance of public participation and as such, Plan specific comments are addressed through SCAG's online form system which documents and tracks all Plan related comments by sub-category (Goods Movement, Environmental Justice, Conformity Analysis, etc.). Each comment related to the Plan was given a submission ID number (e.g., Submission ID 16285) which was logged and each comment on the Plan responded to as part of the final Plan.

Public participation is a key component of the regional transportation planning process; SCAG encourages public participation and maintains the integrity of input received from local jurisdictions. Commenters who are reviewing the responses to comments to the PEIR and are also interested in Plan related changes can look up the Plan related responses by searching for their submission ID number within the **Comments and Responses Appendix**, which is a sub-appendix of the Final Connect SoCal **Public Participation and Consultation Appendix**. Responses to comments and revisions to Connect SoCal are available via the web at: <https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx>.

This Final PEIR, together with the Final Connect SoCal Plan, will be submitted to the SCAG Regional Council for review, and the SCAG Regional Council will consider certification of the Final PEIR and approval of the Plan.

## 9.2 MASTER RESPONSES

As a result of public review of the Draft PEIR, some themes in comments submitted to SCAG recurred in multiple letters. This subsection provides “Master Responses” for issues that recurred in multiple comment letters. The Master Responses address multiple similar or related comments and themes and provide a comprehensive reply as well as additional information that may have been requested by any individual comment. The responses to the individual comment letters cite the Master Responses as appropriate. Master Responses for this Final PEIR are as follows:

### **Master Response No. 1: General Comments and Non-CEQA Issues**

The Draft Program Environmental Impact Report for Connect SoCal (“PEIR”) was circulated for a 45-day public review period, from December 9, 2019 to January 24, 2020. Fifty-two (52) comment letters on the Draft PEIR were received by SCAG during the comment period. Several of the comment letters contained only comments on the Draft PEIR, while others contained comments on both the Draft PEIR and Draft Plan or comments only on the Draft Plan.

Pursuant to California Environmental Quality Act (CEQA) Guidelines §15088(a), SCAG is required to evaluate comments on environmental issues received from public agencies and other interested parties who reviewed the Draft PEIR. It is important to note that CEQA requires good faith written responses to all “comments on environmental issues,” but not all comments (*City of Irvine v County of Orange* (July 6, 2015) 238 Cal. App. 4th 526). As such, the PEIR provides responses to comments directly related to the environmental analysis that is the subject of the PEIR.

Comments for Connect SoCal were re-routed to SCAG’s online form system which documents and tracks all Plan related comments by sub-category (Goods Movement, Environmental Justice, Conformity Analysis, etc.). Each comment related to the Plan was given a submission ID number (e.g., *Submission ID 0001549*) and has been logged appropriately for Planning staff to review and respond to through the Connect SoCal review process.

### ***Purpose of EIR and EIR Process***

CEQA’s statutory framework sets forth a series of analytical steps intended to promote the fundamental goals and purposes of environmental review – information, participation, mitigation, and accountability. The purpose of an EIR is to provide public agencies and the public in general with detailed information about the effect that a project is likely to have on the physical environment, to list ways in which any significant adverse effects might be minimized, and to indicate alternatives that reduce any identified adverse impacts (Public Resources Code Section 21061). Thus, the purpose of this EIR is to evaluate potential impacts on the environment resulting from the Proposed Plan and to identify mitigation

measures and alternatives that would avoid or substantially lessen significant environmental impacts while attaining most of the objectives of the Plan.

Pursuant to the California Public Resources Code Section 21091(d), SCAG considered all comments received on the Draft PEIR and this document provides written response describing the “disposition of each significant environmental issue that is raised by commenters.” *CEQA Guidelines* Section 15088 provides further guidance on the preparation of response to comments and indicates that while lead agencies must evaluate all comments received on a Draft PEIR they need only respond to comments related to significant environmental issues associated with a project. *CEQA Guidelines* Section 15204 further provides that lead agencies in responding to comments do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR. *CEQA Guidelines* Section 15204 recommends that commenters focus on the sufficiency of the EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Section 15204 further indicates that commenters should provide an explanation and evidence supporting their comments. An effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion (*CEQA Guidelines* Section 15064). CEQA case law has held that lead agencies are not obligated to undertake every suggestion given to them and are also not required to conduct every test or perform all research, study, and experimentation recommended by commenters. Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the lead agency based on substantial evidence in the record.

### *Adequacy of Analysis*

The focus of SCAG’s responses to comments received on the Draft PEIR is the “disposition of significant environmental issues raised” in the comments (*CEQA Guidelines* Section 15088(c)). Detailed responses are not necessarily provided for comments that do not relate either to significant environmental issues or adequacy of the analysis in the PEIR. This includes comments that raise issues that are not environmental impacts as identified by CEQA (e.g., socioeconomic concerns), or relate to unsupported opinions regarding the adequacy of the PEIR analysis and/or the PEIR’s findings of significance.

CEQA was recently amended to reflect recent case law to clarify that CEQA is focused on the analysis of impacts of the project on the environment and not impacts of the environment on the project.<sup>2</sup> So for example, geotechnical issues are only of concern with respect to an analysis under CEQA, if a project

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<sup>2</sup> See California Supreme Court’s decision in *California Building Industry Association v Bay Area Air Quality Management District*, (S213478, December 17, 2015) and California Court of Appeals decision in *California Building Industry Association v Bay Area Air Quality Management District*, (August 12, 2016).

could exacerbate existing conditions. Or with respect to residential uses located in proximity to a freeway, impacts of existing air pollution need only be addressed in a CEQA document if a project would exacerbate existing conditions. That is not to say that geotechnical concerns and freeway pollution are not concerns to be addressed in the entitlement process, they are just addressed outside the CEQA process. The Connect SoCal PEIR evaluates these existing conditions in relation to the Plan in order to determine if the Plan has the potential to exacerbate impacts.

The analysis in the Connect SoCal PEIR is based on scientific and factual data which has been reviewed by the lead agency and reflects its independent judgement and conclusions. CEQA permits disagreements between experts with respect to environmental issues addressed in an EIR. As stated in Section 15151 of the *CEQA Guidelines*, disagreement among experts does not make an EIR inadequate. The courts have looked not for perfection but for adequacy, completeness and a good faith effort at full disclosure.

#### ***Plan Comments***

This PEIR is not intended or required to provide justification for Connect SoCal. Rather, this PEIR is an informational document that is intended to provide public agencies and the public with detailed information about the effect that the Plan is likely to have on the environment. This PEIR also identifies ways in which the significant effects of the Plan might be minimized and identifies alternatives to the Plan. The PEIR is not a vehicle for making changes to the Plan absent the proposed change reducing one or more identified significant adverse environmental impacts. Requests for changes to the Plan on individual properties are addressed outside the CEQA process.

#### ***Opinions and General Support for, or Opposition to, the Project***

A number of comments raise issues that are not within the purview of CEQA, such as suggestions for changes to the Plan unrelated to potential significant adverse environmental impacts. The commenters often raise issues that are important to the decision-making process but are not properly addressed as part of the CEQA process. In addition, several commenters provide their opinion(s) that impacts be considered significant or that the significance conclusions in the EIR be revised but do not provide substantial evidence in support of their opinions. Commenters also express their opinions in support or opposition to the Plan, or outline concerns associated with specific features or provisions of the Plan that do not relate either to significant environmental issues or adequacy of the environmental analysis in the EIR.

While SCAG welcomes all comments, opinions and expressions of opposition or support unrelated to physical environmental impacts, these comments are appropriately addressed outside the CEQA process.

The purpose of the PEIR is to present objective information as to the Proposed Plan's potential physical environmental impacts. Moreover, the purpose of allowing the public and agencies to comment on a Draft PEIR is to allow any errors to be identified and corrected. Opinions concerning issues not addressed by CEQA, unsupported opinions regarding environmental issues already addressed in an EIR, as well as expressions of opposition or support for a project, are made a part of the administrative record and are forwarded to the decision-makers for their consideration in taking action on the project, but they are not responded to in a CEQA document.

**Master Response No. 2: Program EIR vs. Project EIR**

The Connect SoCal PEIR is a programmatic document that provides a region-wide assessment of the potential significant environmental effects of implementing policies, strategies, projects, and programs included in Connect SoCal. CEQA allows that a Program EIR, "may be prepared on a series of actions that can be characterized as one large project and are related either (1) geographically, (2) as logical parts of the chain of contemplated actions, (3) in connection with issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program, or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways" (*CEQA Guidelines* § 15168). The PEIR for Connect SoCal offers regional scale analysis of the impacts of the Plan and provides mitigation measures to be implemented by SCAG at the regional level, and mitigation measures for subsequent, site specific environmental review, including project-level EIRs and/or Environmental Impact Statements (EISs) prepared by implementing agencies for individual projects as well as General Plans.

The focus of the environmental analysis in the PEIR is on potential regional-scale impacts associated with implementation of Connect SoCal as a whole. Connect SoCal includes individual transportation projects and provides land use policies set forth in the SCS component of the Plan. Because the Plan and PEIR is programmatic in nature and regional in approach, it does not include site-specific analysis of any project contained in Connect SoCal. Many of the individual transportation projects included in the Plan are early in the development phase, and detailed project/site specific analysis is not appropriate at this time without undue speculation. (See *CEQA Guidelines* § 15126.6(f)(3)).

While the PEIR identifies a number of significant impacts at the regional level, these impacts must be separately assessed at the project level to determine whether specific project conditions may result in significant impacts at the local or sub-regional level. Subsequent project-level environmental analyses will determine whether or not an individual project has significant, project-level impacts requiring the consideration of project-level mitigation measures.



Use of a program-level approach ensures consideration of the cumulative effects of the transportation projects contemplated over the 25-year planning horizon and avoids duplicative reconsideration of the basic policy consideration in the Plan related to land use patterns, alternative modes of travel, active transportation, and sustainability. As specified by Section 15168(c) of the *State CEQA Guidelines*, subsequent activities analyzed in the PEIR must be examined to determine whether an additional environmental document must be prepared. If a later activity would have effects that were not examined in the PEIR, a new initial study would need to be prepared leading to determine the appropriate level of environmental compliance documentation pursuant to CEQA (See *CEQA Guidelines* § 15002(k)).

**Master Response No. 3: Baseline Conditions**

Environmental impacts for the PEIR were determined by applying the thresholds of significance which compare future Plan conditions to the existing environmental setting (See *CEQA Guidelines* §15126.2(a)). The PEIR must identify significant impacts that would be expected to result from implementation of the Plan. Significant impacts are defined as a “substantial or potentially substantial, adverse change in the environment” (Public Resources Code § 21068).<sup>3</sup> Significant impacts must be determined by applying explicit significance criteria to compare the future Plan conditions to the existing environmental setting (*CEQA Guidelines* § 15126.2(a)).<sup>4</sup> The existing setting is described in detail in each resource section of Chapter 10.0 of this document, and represents the most recent, reliable, and representative data to describe current regional conditions at the time of publication of the NOP for the PEIR, January 23, 2019. In most instances, the most recent available data was for 2018 or 2019. For population, land use and related modeling analyses (air quality, transportation and noise), base year information is collected every four years as part of the Plan. The base year for the Plan is 2016. For purposes of the PEIR, 2019 data has been estimated based on an interpolation of 2016 to 2045 projections. Available data that differs from this generalized explanation and used to determine existing conditions is specified in each resource section in Chapter 3.0 of this document.

The existing environmental setting was described in detail for each of the resource categories (see **Chapter 1.0, Introduction**, and **Chapter 3.0, Environmental Analysis**, for further clarification) and represents the most recent and representative data to describe current regional conditions during the publication of the NOP for the PEIR.

SCAG agrees that, “the public and decision makers are entitled to the most accurate information on projects practically possible, and the choice of a baseline must reflect that goal.” (*Communities for a Better*

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<sup>3</sup> California Legislative Information. *Public Resources Code – PRC, Division 13. Environmental Quality, Chapter 2.5. Definitions [21060-21074]*.

<sup>4</sup> CEQA. *Article 9. Contents of Environmental Impact Reports*.

*Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310). The *Neighbors for Smart Rail vs. Exposition Metro Line Construction* lawsuit challenged Metro's use of the future no project condition instead of the existing condition for assessing project impacts. The Court ruled that a lead agency has discretion to omit existing conditions analyses by substituting a baseline consisting of environmental conditions projected to exist solely in the future, but to do so the agency must justify its decision by showing an existing conditions analysis would be misleading or without informational value.

While SCAG uses existing conditions as the baseline to assess the significance of potential environmental impacts, as is the default under CEQA, the PEIR nevertheless identifies Future No Project (i.e., future no build) impacts compared to Future Plan impacts for the information of the public and decision makers. Adding anticipated increases in traffic to existing conditions (and using existing emission factors) would be unreasonable; SCAG is no more responsible for all the growth in the region than it is responsible for changes in emissions factors. SCAG conservatively analyzes changes in the region between 2019 and 2045 as a whole in the context in which they could reasonably occur.

#### **Master Response No. 4: Technical Process/Modeling**

Transportation modeling for the Plan is based on SCAG's Regional Travel Demand Model, which is an activity-based model that meets all the requirements of the Transportation Conformity Rule, specifically 40 CFR 93.122(b). To calculate greenhouse gas emissions, results from the Regional Travel Demand Model are input to ARB's Emission Factors (EMFAC 2014) model, which was approved by U.S. EPA on Dec. 14, 2016. Although U.S. EPA recently approved a newer version of the model, EMFAC2017, on August 15, 2019, a two-year grace period had been established by U.S. EPA to allow EMFAC2014 for regional conformity analysis through August 15, 2021 [see 40 CFR sec. 93.111(c)]. The regional emissions analysis for Draft Connect SoCal started in early 2019, long before the approval of EMFAC2017. For those areas which require budget tests, the Plan emissions values in the summary tables below utilize the rounding convention used by ARB to set the budgets (i.e., any fraction rounded up to the nearest ton), and are the basis of the conformity findings for these areas.

Additionally, in order to conservatively account for the emission impact of the federal "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program," all the plan and no-build emissions reflect the EMFAC2014 off-model adjustment factors released by ARB on November 20, 2019.<sup>5</sup>

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<sup>5</sup> Note that while the SAFE Rule caused FHWA and FTA to temporarily cease conformity findings pending direction from EPA, EPA recently issued such direction when it approved CARB's off-model adjustment factors for EMFAC 2014 modeling. (See Letter from US EPA to FHA and FTA dated March 12, 2020 re: Appropriate Model for Transportation Conformity in California). As such, FHWA and FTA is expected to resume transportation conformity determinations.

Transportation conformity is required by the federal Clean Air Act to ensure that federally-supported transportation activities conform to or are consistent with the State's air quality implementation plan for meeting the federal health-based air quality standards. To comply with the CAA in achieving the NAAQS, State Implementation Plans (SIPs) are required to be developed for federal nonattainment and maintenance areas. A SIP may include two important components relative to transportation conformity requirements – motor vehicle emissions budgets (for all criteria pollutant SIPs) and TCMs (for ozone and CO SIPs only). The emissions budgets set an upper limit which transportation activities (for SIP purposes, motor vehicles are also known as “on-road mobile sources”) are permitted to emit. The regional emissions analysis presented in the Connect SoCal Transportation Conformity Analysis uses EMFAC2014.

To the extent possible, the Plan and the PEIR aim to be consistent with one another, as such, the PEIR also uses EMFAC 2014 for the analysis. SCAG's transportation demand model, which provides the basis for the HRA, is highly complex with myriad inputs and adjustments. To recreate the complete SCAG transportation demand model using EMFAC 2017, which had not been approved at the time the analysis for the Plan or the PEIR had commenced, would undoubtedly create confusion and schedule delay. For these reasons, the PEIR uses EMFAC 2014. Regarding the utility of the Plan's conformity determination with EMFAC 2014, the process for amendments and project conformity determinations is vetted through SCAG's Transportation Conformity Working Group. At this time, there is no proposed change in the process for project review.

SCAG's regional transportation modeling area covers the entire SCAG region, including the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. SCAG's modeling area is divided into 11,267 Transportation Analysis Zones (TAZs) with an additional 40 external cordon stations, 12 airport nodes, and 31 port nodes for the Ports of Los Angeles and Long Beach. The SCAG model was peer reviewed and developed based on the 2012 California Household Travel Survey. A comprehensive model validation was also performed to ensure the model properly replicates base year (2016) travel conditions, which is the base year for Connect SoCal.

Modeling input and assumptions for SCAG's modeling include but are not limited to socioeconomic data, highway networks, and transit networks. This also includes all projects which were featured in the Plan's Project List Appendix which were provided by the six County Transportation Commissions (CTCs) in the SCAG region. It is important to emphasize that Connect SoCal does not primarily focus on specific or local projects but analyzes the transportation network of the entire region.

To achieve federal transportation conformity, SCAG is required to model regionally significant and federally supported projects contained within the Federal Transportation Improvement Program (FTIP).

SCAG is aware that some of the projects are currently under environmental review and that a preferred alternative has yet to be determined. Upon determination of the preferred alternative, SCAG will work with applicable local jurisdictions to amend the RTP/SCS as necessary to update the project description and associated modeling analysis.

The forecasted land use development patterns are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analysis. Data at the TAZ level or at a geographically smaller than the jurisdictional level are advisory only, and non-binding, since SCAG sub-jurisdictional forecasts are not adopted as part of the Plan. The data is controlled to be within the density range of local general plans and/or based upon input received from local jurisdictions. For purposes of evaluating a local project's eligibility to utilize CEQA streamlining opportunities, lead agencies have the sole discretion to determine project consistency with Connect SoCal.

The EMFAC2014 (approved by U.S. EPA in December 2015) model is a computer model capable of estimating both current year, back-cast and forecasted emission inventories for calendar years 2000 to 2050. EMFAC estimates the emission rates of 1965 and newer vehicles, powered by gasoline, diesel or electricity. Emission inventory estimates are made for 51 vehicle classes segregated by usage and weight. EMFAC calculates the emission rates of CO<sub>2</sub> and other criteria pollutants, such as ROG, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>x</sub>, and also CH<sub>4</sub> for 45 model years for each vehicle class within each calendar year, for twenty-four (24) hourly periods, and each month of the year, for each district, air basin, county and sub-county in California.

The CARB Vision Scenario Planning Tool is another computer model that was used to determine multiple pollutants (CO<sub>2</sub>, PM<sub>2.5</sub>, NO<sub>x</sub> and ROG) for the transportation system-wide categories such as locomotives, and ships. It is based on California specific data from different CARB official emission inventories, such as off-road mobile sources (i.e., locomotives, and Ocean-Going Vessels).

To determine regional CO<sub>2</sub> and other criteria pollutants for the "On-road" transportation sector which included Light and Medium-duty vehicles (LMDV; vehicles with weight class less than 8,500 lbs), Heavy duty trucks (HDT; Trucks with weight class greater than 8,501 lbs) and all buses, SCAG runs the EMFAC2014 model using the output from the trip-based regional transportation demand model. In order to compare with the regional GHG emissions targets derived using EMFAC2007 (in 2010), the EMFAC2014 model GHG emissions outputs have been converted to EMFAC2007 equivalents applying ARB's adjustment methodology.

For CO<sub>2</sub> equivalent (CO<sub>2e</sub>) estimation, the three main Greenhouse Gases (GHGs): CO<sub>2</sub>, Methane (CH<sub>4</sub>) and Nitrous Oxide (N<sub>2</sub>O) from both "On-road" and "Off-road" transportation sector are obtained from

EMFAC2014 and ARB's Vision tool respectively. The "Off-road" transportation sector includes rail, aviation and Ocean-Going Vessel (OGV). Standard ratios are used to convert the GHGs into CO<sub>2e</sub>. These ratios are based on the Global Warming Potential (GWP) of each gas which describes its total warming impact relative to CO<sub>2</sub>. For example, GWP for CH<sub>4</sub> is 25, meaning that one ton of CH<sub>4</sub> will cause the same amount of warming as 25 ton of CO<sub>2</sub>. After all GHGs are converted, they are aggregated as the regional total CO<sub>2e</sub>.

SCAG's Scenario Planning Model (SPM) was used to assist in scenario planning and determining output for the SCS. SPM is a data management, land use planning and modeling tool built on the open source version of UrbanFootprint platform (UF 1.5), which was originally developed by Calthorpe Analytics in partnership with SCAG and other California Public Agencies. SPM enables the creation and organization of local and regional data, plan and policies, facilitates scenario creation and editing and estimates a wide range of potential benefits resulting from alternative transportation and land use strategies.

SPM has been deployed as two separate web services: Data Management (DM) tool and Scenario Development and Analysis (SD) tool. SPM-DM provides a common data framework within which local planning efforts can be easily integrated and synched with regional plans. Using a variety of data management and review options, the user (local jurisdictions) can explore data, export attributes and edit configured layers. SPM-DM was released in November 2018 to all 197 local jurisdictions in the SCAG region in support of SCAG's local input and envisioning process for the Connect SoCal. To assist cities and counties in using the tool, a total of 21 hands-on training sessions in a classroom setting have been provided throughout the region. SPM-SD includes a suite of tools and analytic engines that facilitate scenario creation and editing with advanced analytic capabilities and allow meaningful comparison across different land use and transportation options. Starting with the 2016 RTP/SCS, SPM-SD has been used in providing directional and order-of-magnitude impacts of local land use and policy decisions that would assist in the development of regional plans and associated scenario analysis.

Please refer to the Transportation Conformity Analysis Technical Report and the Sustainable Communities Strategy Technical Report for further clarifications regarding methodology, model inputs and assumptions.

#### **Master Response No. 5: Approach to Mitigation Measures**

CEQA requires that SCAG identify all feasible mitigation measures in the PEIR that will avoid or substantially lessen the significant environmental effects of the project.<sup>6,7,8</sup> CEQA, however, does not

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<sup>6</sup> California Legislative Information, *Chapter 1. Policy [21000-21006]*.

<sup>7</sup> California Legislative Information. *Chapter 2.6. General [21080-21098]*.

require a lead agency to undertake identified mitigation measures, even if those measures are necessary to address a project's significant environmental effects, if the agency finds that the measures "are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency"<sup>9</sup> *City of Marina v. Bd. of Trustees of the Calif. State Univ.* (2006) 39 Cal.4th 341, 366; see also *Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439). Under these circumstances, the lead agency may find that the measures "can and should" be implemented by the other agency or agencies said to have exclusive responsibility/jurisdiction over the measures (*City of Marina*, 39 Cal.4th at 366). As the *CEQA Guidelines* explain, the "finding in subsection (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives."<sup>10</sup>

Furthermore, SB 375 specifically provides that nothing in an SCS supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use policies and regulations, including their general plans, to be consistent with the SCS or an alternative planning strategy.<sup>11</sup> Moreover, cities and counties have plenary authority to regulate land use through their police powers granted by the California Constitution, art. XI, §7, and under several statutes, including the local planning law,<sup>12</sup> the zoning law,<sup>13</sup> and the Subdivision Map Act.<sup>14</sup> As such, SCAG has no concurrent authority/jurisdiction to implement mitigation related to land use plans and projects that implement the Plan. With respect to the transportation projects in the Plan, these projects are to be implemented by Caltrans, county transportation commissions, local transit agencies, and local governments (i.e., cities and counties), and not SCAG. SCAG also has no authority/jurisdiction to require these agencies to implement project-specific mitigation measures.

In litigation challenging SANDAG's adoption of its 2050 Regional Transportation Plan/Sustainable Communities Strategy, the California Court of Appeal found that "[a]n EIR may not defer the formulation of mitigation measures to a future time, but mitigation measures may specify performance standards which would mitigate the project's significant effects and may be accomplished in more than one specified way." *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2014) 231 Cal. App. 4th 1056, 1089 (partially reversed on other grounds by *Cleveland National Forest Foundation v. San*

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<sup>8</sup> CEQA. Article 9. Contents of Environmental Impact Reports.

<sup>9</sup> California Legislative Information. Chapter 2.6. General [21080-21098].

<sup>10</sup> CEQA. Article 7. EIR Process.

<sup>11</sup> California Legislative Information. Public Resources Code – PRC, Division 13. Environmental Quality, Chapter 2.5. Definitions [21060-21074].

<sup>12</sup> California Legislative Information. Chapter 3. Local Planning 65100-65763.

<sup>13</sup> California Legislative Information. Chapter 4. Zoning Regulations 65800-65912.

<sup>14</sup> California Legislative Information. Division 2 Subdivisions 66410-66499.38.

*Diego Assn. of Governments* (2017) 3 Cal.5th 497<sup>15</sup>

CEQA Guidelines section 15126.4(a)(1)(B) codifies this concept:

“Formulation of mitigation shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project’s environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.”

In this case, the project-level mitigation measures could be considered deferred mitigation for the Plan, however, since SCAG has no authority to impose project-level mitigation, it will be up to local lead agencies, to determine and commit to the appropriate mitigation measures (and performance standards) for the individual projects. Note that this PEIR does not rely on the project-level mitigation measures being implemented in making significance findings (since the measures are within the jurisdiction of another agency and cannot be implemented by SCAG). As discussed in more detail below, consistent with CEQA Guidelines section 15091(a)(2), SCAG has identified project-level mitigation measures that such agencies “can and should” adopt as appropriate and feasible. Local lead agencies would coordinate with permitting agencies (e.g., air quality management districts, California Coastal Commission, California Department of Fish and Wildlife, etc.) and adopt and implement appropriate mitigation measures required based on the specific conditions of the project in compliance with applicable planning, zoning and environmental protection regulations.

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<sup>15</sup> CEQA case law has also held that deferral of the specifics of mitigation is permissible where the lead agency commits itself to mitigation and, in the mitigation measure, either describes performance standards to be met in future mitigation or provides a menu of alternative mitigation measures to be selected from in the future (*California Native Plant Society v. City of Rancho Cordova* (2009) 172 Cal.App.4th 603 [the details of exactly how the required mitigation and its performance standards will be achieved can be deferred pending completion of a future study]; *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1448–1450 [a deferred approach may be appropriate where it is not reasonably practical or feasible to provide a more complete analysis before approval and the EIR otherwise provides adequate information of the project’s impacts]; *Sacramento Old City Assn. v. City Council of Sacramento*, supra, 229 Cal.App.3d at 1028–1029 [deferral of agency’s selection among several alternatives based on performance criteria was appropriate]).

Some commenters have suggested compliance with existing regulations may not be considered mitigation because compliance is already required. However, such regulations do reduce environmental impacts and are sometimes identified herein where appropriate, to provide information on how potential impacts are reduced. In some cases, as indicated in the PEIR, regulatory compliance is enough to reduce impacts to a level of less than significance. In other cases, mitigation is proposed to ensure and/or specify the means of compliance with regulations that lack specificity. In any event, requiring compliance with existing regulations as mitigation is consistent with CEQA. “[A] condition requiring compliance with regulations is a common and reasonable mitigation measure and may be proper where it is reasonable to expect compliance.” *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal. App. 4th 214, 246 (quoting *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 906). Indeed, in many cases, the regulations provide the standard for future (project-level) mitigation to satisfy CEQA. *See id.* (“These regulations [requiring the development of hatchery genetic management plans] provide sufficient performance standards to satisfy CEQA.”). However, in many jurisdictions the identification of appropriate performance standards may be specific to local conditions. Mitigation measures are subject to the same rules regarding level of detail appropriate to the EIR being prepared. In this case, the PEIR addresses a large-scale region with a variety of projects spread over more than 20 years. As such, this PEIR identifies program-wide measures for implementation by SCAG. In addition, the PEIR identifies project-level mitigation measures for lead agencies to consider, as applicable and feasible, in subsequent project-specific design, CEQA review, and decision-making processes. It is ultimately up to the lead agency to determine the appropriateness of the mitigation measure based on project-specific circumstances. As appropriate and authorized by the *CEQA Guidelines* and case law, the program-wide mitigation measures included in this PEIR are less detailed than those that would be part of a project EIR and the selection of detailed mitigation measures is properly deferred to future project-specific CEQA reviews.

The project-level mitigation measures identified by SCAG (or comparable measures) “*can and should*” be considered by lead agencies in project-specific environmental review documents as appropriate and feasible. This language mirrors *CEQA Guidelines* section 15091(a)(2), and it is assumed that each lead agency for specific projects would have the ability to impose and enforce these measures (i.e., that they can implement them). Lead agencies for specific projects are responsible for developing project specific mitigation measures and ensuring adherence to such mitigation measures.

While the PEIR strives to provide as much detail as possible in the mitigation measures, some flexibility must be maintained to present mitigation approaches for impacts occurring over a large geographic scope and caused by a wide variety of transportation and land use activities. CEQA case law provides that a first-tier EIR may contain generalized mitigation criteria (see, e.g., *Koster v. County of San Joaquin* (1996) 47



Cal.App.4th 29). In addition, in each resource area, the PEIR identifies mitigation measures which lead agencies “can and should” consider in assessing and mitigating project-specific impacts as appropriate and feasible. SCAG then identifies examples of project-level mitigation measures that may be required by lead agencies. Lead agencies may also identify other comparable measures capable of reducing impacts below the specified threshold.

For projects proposing to streamline environmental review pursuant to SB 375, SB 743, or SB 226, or for projects otherwise tiering off this PEIR, the project-level mitigation measures described in this PEIR (or comparable measures) can and should be considered and adopted by lead agencies (and project sponsors) during the subsequent, project- or site-specific environmental reviews for transportation and development projects as applicable and feasible. However, SCAG cannot require lead agencies to adopt mitigation, and it is ultimately the responsibility of the lead agency to determine and adopt project-specific mitigation as appropriate and feasible for each project.

The project-level mitigation measures used in this PEIR recognize the limits of SCAG’s authority; distinguish between SCAG commitments and project-level responsibilities and authorities; optimize flexibility for project implementation; and facilitate CEQA streamlining and tiering where appropriate on a project-by-project basis determined by each lead agency.

Compliance with existing regulations, such as the Uniform Building Code and California Building Code may not be considered mitigation because compliance is already required. However, such regulations do reduce environmental impacts and are sometimes identified herein where appropriate, to provide additional information on the how potential impacts are reduced. In some cases, as indicated in the PEIR, regulatory compliance is enough to reduce impacts to a level of less than significance. In other cases, mitigation is proposed to ensure and/or specify the means of compliance with regulations that lack specificity. In any event, requiring compliance with existing regulations as mitigation is consistent with CEQA. “[A] condition requiring compliance with regulations is a common and reasonable mitigation measure and may be proper where it is reasonable to expect compliance.” *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal. App. 4th 214, 246 (quoting *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 906). Indeed, in many cases, the regulations provide the standard for future (project-level) mitigation to satisfy CEQA. *See id.* (“These regulations [requiring the development of hatchery genetic management plans] provide sufficient performance standards to satisfy CEQA.”)

**Master Response No. 6: Vehicle Miles Traveled (VMT) Analysis****Overview**

With a continuously growing regional population, now exceeding 19 million residents, the containment of vehicle miles traveled (VMT) growth and the associated greenhouse gas (GHG) emissions generated by motor vehicles presents a major challenge for the SCAG region. SCAG is actively working with its jurisdictions on a variety of fronts, including the development and implementation of aggressive VMT reduction strategies. It is understood that focusing on any singular strategy for reducing GHG is insufficient for meeting our regional GHG targets, and that efforts toward reducing VMT do not constitute the entirety of mobile source GHG emissions reduction opportunities. However, other strategies, including the development of clean vehicle technologies and adoption of cleaner vehicle fuel standards (as well as GHG emission reductions associated with stationary and other sources), are beyond SCAG's regional planning purview. For this reason, SCAG's planning efforts toward reducing GHG emissions to meet our regional climate goals are focused largely, but not exclusively, on containment of VMT growth. The reduction of regional GHG emissions is among the highest priorities of SCAG's 2020 RTP/SCS (Connect SoCal). The integrated program of projects, plans, and strategies contained within Connect SoCal provide a solid foundation for making significant progress toward achievement of our regional GHG reduction objectives.

**Background**

In response to growing concerns regarding the consequences of climate change and the role of VMT in the generation of GHG emissions, the California state legislature passed Senate Bill 743 in 2013. SB 743 required the adoption of a new methodology to replace motor vehicle delay, measured by 'Level of Service' (LOS), for evaluating transportation impacts under the CEQA review process. The new methodology was required to facilitate GHG emissions reduction; encourage development of compact, transit-oriented communities; and promote the provision and enhancement of bicycle and pedestrian facilities and amenities.

Statewide implementation of the SB 743 CEQA transportation impact assessment provisions, combined with other regulations aimed at reducing VMT, are expected to generate VMT reduction benefits which will reduce GHG emissions produced by motor vehicles throughout the state. The *CEQA Guidelines* were updated as of January 1, 2019 to specify VMT as the metric to be used for determining the significance of transportation impacts.<sup>16</sup> It should be noted that SCAG has traditionally undertaken VMT analysis as it is considered to be most appropriate for regional-scale analysis. While LOS analysis may be useful in

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<sup>16</sup> *CEQA Guidelines* § 15064.3

determining the efficiency of local intersections, it is not a viable tool for assessing the efficiency of a regional transportation system. For these reasons, SCAG considers VMT analysis to be the most appropriate tool for evaluating the overall performance of the regional transportation network and for evaluating and meeting our regional GHG reduction goals.

In November of 2018, CARB released its 2018 California’s Sustainable Communities and Climate Protection Act Progress Report, recognizing the importance of realizing and measuring the benefits identified through SB 375 planning work.<sup>17</sup> Key findings of the report include that while positive gains have been made to improve the alignment of transportation, land use, and housing policies with state goals, the data suggests that more action is necessary for attaining our climate goals. CARB indicates their regional 2035 GHG emissions reduction targets under SB 375 are not adequate to fully meet the goals of the 2017 Scoping Plan for the cars and light-duty trucks. Collectively, CARB determined that if the state’s 18 MPOs all met the SB 375 GHG emissions reduction targets set in 2018, a 19 percent reduction in per capita GHG (from cars and light-duty trucks) would be achieved by 2035. In the target re-setting report, CARB expressed that to meet the statewide reduction goals set forth by SB 32 and the 2017 Scoping Plan, the state would need to reduce per capita GHG emissions from cars and light-duty trucks by 25 percent by 2035, resulting in a six percent gap between the 19 percent emissions reduction targets set for the regions (averaged for the 18 MPOs and compared to a baseline year of 2005). Therefore, even with meeting CARB’s SB 375 GHG emissions reduction target, a six percent gap compared to the state’s 25 percent reduction goal remains.

As CARB notes, “[a]n RTP/SCS that meets the applicable SB 375 targets alone will not produce the GHG emissions reductions necessary to meet state climate goals in 2030 nor in 2050”.<sup>18</sup> CARB has also noted that greater reductions in VMT will be required to make up the six percent gap in GHG emissions targets. Further, according to the 2018 Sustainable Communities Progress Report, “California – at the state, regional, and local levels – has not yet gone far enough in making the systemic and structural changes to how we build and invest in communities that are needed to meet state climate goals.” It will require collaboration among all levels of government and the MPOs to identify the additional VMT reductions needed to achieve the state’s climate goals. MPOs need to maintain a leadership role in the GHG reduction efforts within their region, working closely with their local jurisdictions, with the

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<sup>17</sup> CARB. 2018. *2018 Progress Report California’s Sustainable Communities and Climate Protection Act*. Available online at: [https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report\\_SB150\\_112618\\_02\\_Report.pdf](https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf), accessed October 3, 2019.

<sup>18</sup> CARB. 2017. *Final Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets*. Available online at: [https://ww3.arb.ca.gov/cc/sb375/final\\_staff\\_proposal\\_sb375\\_target\\_update\\_october\\_2017.pdf?ga=2.217174102.1993336916.1570127197-1229197864.1566229390](https://ww3.arb.ca.gov/cc/sb375/final_staff_proposal_sb375_target_update_october_2017.pdf?ga=2.217174102.1993336916.1570127197-1229197864.1566229390), accessed October 4, 2019.

understanding that MPOs do not have the land use authority or the resources to meet this extraordinary challenge alone.

OPR and CARB have both published recommendations for reducing VMT reductions at the project level which may provide a means to close the gap between GHG reductions achieved through SCS implementation and the GHG reductions necessary to meet the state's goals. As additional GHG reductions from the transportation sector become increasingly difficult to achieve, it is possible that a cap-and-trade style strategy may prove to be a viable method for further reducing transportation-related emissions through a market-based carbon trading mechanism applied at a regional level.<sup>19</sup> Implementation of such a cap-and-trade program remains speculative at the time of writing this PEIR, however. Additionally, and as recognized by CARB, MPOs do not have land use authority to implement additional VMT reductions. Furthermore, SCAG has no control or authority over other key GHG producing sectors (e.g., energy, industry, water, waste and agriculture) in meeting the AB 32, SB 32, and Scoping Plan targets.

Recognizing the potential impact SB 743 may have on reducing regional GHG emissions, SCAG is committed to providing the needed policy guidance and technical assistance to ensure its successful implementation at the local level throughout our region. In addition to the multiple workshops and stakeholder meetings hosted by SCAG throughout the SB 743 development process, SCAG has included SB 743 implementation assistance among the eligible project types for our Sustainability Grant Program (SGP). Three such grants were awarded by SCAG for SB 743 implementation projects for the City of Temecula, the San Bernardino County Transportation Authority (SBCTA), and the City of Los Angeles Department of Transportation (LADOT). These grant-funded efforts seek to ease the transition to the VMT assessment methodology for our local jurisdictions and to provide an implementation template for other local agencies throughout our region.

In addition to the SGP grants, SCAG, in collaboration with LADOT, has been awarded a \$500,000 Caltrans Sustainable Communities grant to establish a pilot demonstration for a VMT Mitigation Exchange or Bank program. This pilot program seeks to evaluate the viability of implementing a regional or subregional VMT mitigation mechanism that would permit project-level VMT impacts to be counterbalanced by equivalent VMT mitigation activities in other areas of that region. If successful, a VMT Exchange or Bank program may allow certain transportation or land use development projects that

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<sup>19</sup> In June 2015, fuels (gasoline, diesel, and natural gas) were covered under the Cap-and-Trade programs, which would require fuel suppliers to reduce GHG emissions by supplying low carbon fuels or purchase allowances to cover the GHG emissions produced when conventional petroleum-based fuel is burned. Therefore, a program is already in place within the Cap-and-Trade program to reduce GHG emissions from the transportation section. (See: CARB. *California's Cap and Trade Program: Fuel Facts*. Available online at: [https://ww3.arb.ca.gov/cc/capandtrade/guidance/facts\\_fuels\\_under\\_the\\_cap.pdf](https://ww3.arb.ca.gov/cc/capandtrade/guidance/facts_fuels_under_the_cap.pdf), accessed October 23, 2019.)

generate VMT above locally-identified thresholds, to mitigate such impacts. The VMT exchange program would then be employed to implement or finance feasible VMT mitigation activities (possibly in other areas of the region) to reduce the VMT impact to a less than significant level.

**Master Response No. 7: Regional Housing Needs Assessment**

The PEIR evaluates the environmental effects of implementation of Connect SoCal, and specifically analyzes reasonably foreseeable regional growth as identified in the Connect SoCal Growth Forecast and planned for in the SCS. As discussed in the PEIR, Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region. The population and households are distributed in accordance with the growth forecast as described in the Demographics and Growth Forecast Technical Report in the Plan. Furthermore, while state planning law requires the SCS to identify areas sufficient to house the 8-year RHNA need pursuant to Government Code section 65080(b)(2)(B)(iii) it is important to recognize that the RHNA allocation of housing need is a distinct and separate process set forth under state housing law, Government Code section 65584 et seq. The RHNA requirements address the mandate to plan for housing units to further the statutory objectives. The RHNA establishes “minimum housing development capacity that cities and counties are to make available via their land use powers to accommodate growth within a planning period.”

As will be discussed in more detail below, in contrast to Connect SoCal, the RHNA process is explicitly exempt from CEQA pursuant to Government Code section 65584(g), *CEQA Guidelines* § 15283, and *CEQA Guidelines* section 15282(r). As such, the comments that assert that the RHNA determination should be addressed in this PEIR are incongruous with the regulatory framework of the RHNA.

***RHNA Background***

As discussed in the Connect SoCal Master Response No. 1, the 2016-2045 Growth Forecast undergirding Connect SoCal provides an assessment of the reasonably foreseeable future patterns of employment, population, and household growth in the SCAG region given demographic and economic trends, and existing local and regional policy priorities. The Connect SoCal Growth Forecast begins with an assessment of regional demographic and economic trends and uses a variety of spatially-explicit data sources—including local land use plans—to assess where growth is most likely to occur within the region, emphasizing a balance between future employment, population, and households. Between November 2017 and October 2018, SCAG staff met one-on-one with all 197 local jurisdictions in the region to solicit additional information for improving the accuracy of the preliminary forecast at several intervals (2016, 2020, 2030, 2035, and 2045). Further refinements were made at the small area (i.e., sub-jurisdictional) level to reflect regional sustainability goals and policies through the scenario development process.

The legislative changes of 2018 modified the nature of the regional housing need determination for the 6th Cycle RHNA. Specifically, Government Code 65584.01(b) et seq. explicitly added measures of household overcrowding and housing cost burden to the list of factors to be considered by the California Department of Housing and Community Development (HCD) for the determination of housing need. These new measures (overcrowding and cost burden) are not included in the Connect SoCal Growth Forecast because they are not direct inputs to the growth forecasting process and are independent of employment and population projections. In contrast, they reflect additional latent housing needs in the current population (i.e. “existing need”).

Thus, the 6th Cycle RHNA regional housing need total of 1,341,827, as determined by HCD, consists of both “projected need,” which is intended to accommodate the growth of population and households during the 6th Cycle RHNA (2021-2029), as well as “existing need.” On January 13, 2020, HCD’s finding that SCAG’s draft RHNA methodology furthered the statutory objectives of RHNA, reflected that the determination is separated into “projected need” and “existing need” components. On March 5, 2020, SCAG Regional Council adopted the draft RHNA methodology as the final methodology for the 6th Cycle RHNA.

#### ***Connect SoCal and the 6th Cycle RHNA***

The RHNA identifies anticipated housing need over a specified eight-year period and requires that local jurisdictions make available sufficient zoned capacity to accommodate this need. Actual housing production depends on a variety of factors external to the identification of need through RHNA—local jurisdictions frequently have sufficient zoned capacity but actual housing construction exceeds or fails to achieve RHNA targets due to market and other external forces. For example, per HCD’s most recent Annual Progress Reports covering new unit permits through 2018, the region’s low and very-low income permits totaled 19,328 units (2,494/year) compared to the RHNA allocation of 165,579 units (21,365/year). In contrast, the Connect SoCal Growth Forecast is an assessment of the most likely future pattern of growth given, among other factors described above, the availability of zoned capacity. This contrast is further attenuated since the legislative changes of 2018 have resulted in a 6th Cycle RHNA regional determination which includes significant new measures of “existing need.”

#### ***“Projected Need” Portion of the 6th Cycle RHNA***

The “projected need” portion of the 6th Cycle RHNA is derived from the Connect SoCal Growth Forecast. Specifically, the Connect SoCal Growth Forecast projects 469,725 additional households in the SCAG region over 2021-2029 (Growth Forecast prorated for the 8.25-year RHNA planning period). After subtracting an estimate of household growth occurring on tribal lands (2,767), the remaining 466,958

households represent occupied housing units, to which two adjustment factors are added: vacancy need (14,467 units) and replacement needs (23,545 units) to yield a total of 504,970 housing units reflecting “projected need” for the 6th Cycle RHNA.

**Table 9.0-2**  
**Relationship between Regional Forecasted Households and RHNA “Projected Need”**

Projected Household Growth, 7/2021 – 10/2029	469,725
Tribal Land Growth Estimate	-2,767
Vacancy Need	+14,467
Replacement Need	+23,545
Housing Unit Need to Accommodate Projected Growth (“Projected Need”)	504,970

Since only occupied housing units (households) generate travel demand, they are the primary focus of Connect SoCal’s analysis. Additional housing units (to account for vacancy need and replacement need) associated with this household projection will be accommodated by local jurisdictions within the same areas.

Connect SoCal identifies areas within the SCAG region sufficient to house all the population in the region, including the projected population growth of 3.7 million and household growth of 1.6 million through 2045, the plan horizon year (see Table 5 in the Sustainable Communities Strategy (SCS) Technical Report and Table 13 of the Demographics & Growth Forecast Technical Report). The same areas sufficient to accommodate all the region’s household growth through 2045 will also be sufficient to accommodate the eight-year projection or the “projected need” portion (504,970 units) of the 6th Cycle (2021- 2029) RHNA.

Accordingly, Connect SoCal meets state planning law requirements, specifically Government Code 65080(b)(2)(B)(ii) and (iii) which require that Connect SoCal’s Sustainable Communities Strategy shall:

- (ii) Identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth
- (iii) Identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584

*“Existing Need” Portion of the 6th Cycle RHNA*

In accordance with Government Code Section 65080(b)(2)(B)(iii), as discussed above, Connect SoCal’s SCS identifies areas within the region sufficient to house an eight-year *projection* of the RHNA need, meaning the “projected need” portion (504,970 units) of the 6th Cycle (2021- 2029) RHNA. State planning law does not explicitly require the SCS to identify areas in the region sufficient to house the “existing need” portion of the RHNA. Additionally, for the reasons discussed in this section, existing need could not be reflected within Connect SoCal or the PEIR.

In HCD’s January 13, 2020 letter finding that SCAG’s draft RHNA methodology furthered the statutory objectives of RHNA, HCD identifies the “existing need” as 836,857 units which equals the total regional housing need (1,341,827 units) minus the projected need (504,970 units). The existing need primarily reflects regional measures of overcrowding, cost burden and vacancy.

The 6th Cycle RHNA allocation at the jurisdiction level will not be finalized until October 2020 following an appeals process which may result in changes of to the RHNA at the jurisdictional level. Following adoption of SCAG’s Final RHNA allocation in October 2020, local jurisdictions must update their housing elements (as needed) to provide sufficient zoned capacity for the total 6th Cycle allocation pursuant to state guidelines. Updated housing elements are due in October 2021. The updated housing elements must identify specific locations where potential new housing can be accommodated. Pursuant to Government Code Section 65583(c)(1)(A), local jurisdictions will have until January 2025 to complete any necessary rezoning to accommodate their RHNA allocation. Until this planning work is done at the local level, it would be speculative for Connect SoCal to make assumptions about potential development levels and patterns that includes the 6th Cycle “existing need.” As a result, it would be speculative for the PEIR to make assumptions about the environmental effects of these units.

As discussed above, SCAG’s RTP/SCS Growth Forecast process always incorporates extensive input and data including the most up-to-date local land use information, policy responses, demographic, and economic data in order to determine the most likely future pattern of regional growth. As such, the information necessary to assess the feasibility, quantity, and location of additional household growth stemming from the 6th Cycle of RHNA’s “existing need” allocation will not be available until October 2021 at the earliest and likely later than that for some jurisdictions. Additionally, the identified “existing need” portion of the 6th Cycle RHNA does not impact the region’s projected population, used in the SCS and evaluated in the PEIR, as the “existing need” addresses additional latent housing needs in the existing population rather than implying future population growth. For these reasons, the “existing need” cannot be reflected in Connect SoCal.



However, SCAG will allocate total regional housing need (“existing need” and “projected need”) consistent with the SCS. SCAG’s adopted RHNA methodology for allocating “existing need” focuses on transit and job access (i.e., assign 50% based on jurisdiction’s share of the region’s population within HQTAs and 50% based on a jurisdiction’s share of the region’s jobs that can be accessed within a 30-minute commute) which is aligned with the strategies and policies underlying the regional development pattern in the SCS. As such, in compliance with Government Code section 65584.04(m)(1), SCAG will allocate the “existing need” (as well as the “projected need”) as part of the total RHNA determination, consistent with the development pattern in the SCS.

#### ***RHNA is not a Cumulative Project under CEQA***

The PEIR evaluates reasonably foreseeable regional growth as identified in the Connect SoCal Growth Forecast and forecasted development patterns reflected in the SCS. The RHNA is not a separate cumulative project under CEQA. The RHNA provides housing need information for the same geographic area as the SCS and a portion of the same time frame as the SCS (the RHNA addresses the first eight years of the SCS 25-year planning timeframe). As indicated in the discussion above, local jurisdictions have not yet had the opportunity to review their housing allocations and assimilate that information into their planning process. Once local housing elements are updated to accommodate the identified housing need, a new growth forecast can be prepared. Without the revised housing elements followed by an updated Growth Forecast, the identified housing need remains only speculative in terms of what may reasonably be expected to be constructed and therefore, is not appropriate for analysis within the PEIR (including as an alternative).

Pursuant to Government Code section 65584(g), RHNA determinations made by HCD and SCAG are specifically exempt from CEQA:

“(g) Notwithstanding any other provision of law, determinations made by the department, a council of governments, or a city or county pursuant to this section or Section 65584.01, 65584.02, 65584.03, 65584.04, 65584.05, 65584.06, 65584.07, or 65584.08 are exempt from the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).”

This has always been the case, since the original adoption of the housing element law (SB 1282) in 1989. “Determinations made by the department, a council of governments, or a local government pursuant to this section are exempt from the provisions of the California Environmental Quality Act, which is provided for in Division 13 (commencing with Section 21000) of the Public Resources Code.”

The *CEQA Guidelines* also codified this provision in 1989: “CEQA does not apply to regional housing needs determinations made by [HCD], a council of governments, or a city or county pursuant to Section 65584 of the Government Code.” (*CEQA Guidelines* § 15283). It was later also included as a statutory exemption pursuant to CEQA Guidelines section 15282(r) (“Determinations made regarding a city or county’s regional housing needs as set forth in Section 65584 of the Government Code.”).

The RHNA requires MPOs to determine the share of the total regional housing needs borne by a city or unincorporated areas of counties for all economic sectors of housing and to ensure that sufficient zoning capacity is made available to meet this need. This is a planning exercise that does not result in physical impacts to the environment. Once the allocation is addressed in a jurisdiction’s housing element, the revised housing element is then subject to CEQA review either on its own or as part of a general plan. The housing element of a general plan must identify actions that will be taken to make sites available to accommodate the local government’s allocated share of the regional housing need. According to Govt. Code sec. 65583(c)(1): “To achieve the state’s housing objectives, the law requires each local jurisdiction to zone adequate numbers of sites to accommodate the regional housing burden allocated to it, so that every local jurisdiction shares in the obligation to accommodate the statewide housing need.” (*San Franciscans for Livable Neighborhoods v. City and County of San Francisco*, 26 Cal. App. 5th 596, 610 (2018)).

Finally, as discussed above, the PEIR evaluates reasonably foreseeable growth from 2019 to 2045. The PEIR already evaluates a large amount of growth at a programmatic regional level and identifies significant impacts for most topical areas. While accommodating additional growth may not change the findings of significant impacts identified in the PEIR, the modeling results would likely change. Nevertheless, without advance knowledge of the distribution of regional population and household growth reflecting also existing need and whether, when, and how these housing new units would be constructed, such an analysis is infeasible and would be entirely speculative at this time.

#### **Master Response No. 8: Alternatives**

The formulation of Connect SoCal has been guided by several engagements over the last several years with regional stakeholders, including the involvement of thousands of Southern Californians through one-on-one local data review sessions with jurisdictions, regional planning working groups, outreach to traditionally underrepresented groups through community-based organizations, and numerous public workshops. Plan refinements are based on the Connect SoCal’s Final Growth vision, which reflect jurisdictional-level input on future development received from towns, cities, and counties. To help the region achieve sustainable outcomes, Connect SoCal’s Final Growth Vision will focus growth within jurisdictions near destinations and mobility options, and promote an improved jobs-housing balance to reduce commute times. This is reflective of Connect SoCal’s Core Vision: to build upon and expand land

use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

SCAG developed three alternatives for analysis in the PEIR. Each alternative consists of a transportation network element and a land use pattern element and is aligned in part with the scenarios for developing the Plan (See Section 2.0, Project Description, for further details). The following alternatives are evaluated:

1. No Project Alternative
2. Existing Plans-Local Input Alternative
3. Intensified Land Use Alternative

The No Project Alternative is aligned with the Trend/Baseline Scenario, while the Existing Plans-Local Input Alternative is aligned with the Existing Plans-Local Input Scenario. The Intensified Land Use Alternative incorporates the Plan's transportation network and land use strategies from the accelerated tomorrow scenario.

SCAG did not identify additional alternatives that were rejected. As such, three alternatives were identified for comparative analysis: The No Project Alternative and two other potentially feasible RTP/SCS alternatives, one that increases greenfield development (Existing Plans-Local Input Alternative) and one that places additional emphasis on infill development and transit (Intensified Land Use Alternative).

The No Project alternative, required to be analyzed under CEQA, assumes the projected land use pattern and planned transportation improvements would be consistent with those set forth in the 2016 RTP/SCS and that investments would cease beyond what is currently programmed. The two other alternatives allow for analysis variation in projected land use pattern and planned transportation improvements that could realistically be expected to occur over the Plan horizon. The alternatives reflect different growth patterns and different investment decisions for the transportation system.

Each of the alternatives and the Plan is based on local input. The growth patterns for the Plan, No Project and Existing Plans-Local Input alternatives are all consistent with adopted general plans and zoning. The Intensified Land Use alternative increases density beyond existing general plans.

A more detailed description of each of these alternatives, followed by a comparative analysis of how well the alternative would achieve the project objectives and the relative level of environmental impact associated with each alternative as compared to implementation of Connect SoCal is provided in Section 4.0, Alternatives.

### 9.3 RESPONSES TO COMMENTS RECEIVED ON THE DRAFT PEIR

Numbered responses to each comment received are provided followed by the original bracketed comment letters. Individual comments within each letter are numbered and the response is given a matching number.

**Letter SOV 1: Santa Ynez Band of Chumash Indians Tribal Elders' Council**

Tribal Elders' Council Governing Board

P.O. Box 517

Santa Ynez, CA 93460

December 27, 2019

**Response SOV 1-1**

The comment indicates that the Santa Ynez of Chumash Indians does not request any additional consultation. No additional response is required.

**Letter SOV-2: San Manuel Band of Mission Indians**

Jessica Mauck  
Cultural Resources Analyst  
26569 Community Center Drive  
Highland, CA 92346

January 6, 2020

**Response SOV 2-1**

The commenter identifies updated acreages for the San Manuel Reservation. See **Chapter 10.0, Corrections and Additions**, for this revision made to Section 3.11, Land Use and Planning (p 3.11-21).

**Letter FED 1: U.S. Environmental Protection Agency Region IX**

Debbie Lowe Liang  
Environmental Review Section (ENF-4-2)  
75 Hawthorne Street  
San Francisco, California 94105  
415-947-4155

January 23, 2020

**Response FED 1-1**

This comment is a set of general introductory remarks restating the role of the U.S. EPA and its support of SCAG's goals. It presents no environmental issues within the meaning of CEQA and no specific response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

**Response FED 1-2**

For responses related to the Connect SoCal Plan, please refer to Submission ID 0001464 of the Final Connect SoCal Plan.

**Response FED 1-3**

The comment includes a suggestion to add the SCAG EJ Toolbox as a suggested resource in relevant project-level mitigation measures. As project-level measures are anticipated to be implemented by the local jurisdiction, SCAG has added the EJ Toolbox as a resource for project level mitigation measures for air quality, greenhouse gas, and noise. See **Chapter 10.0, Corrections and Additions**, for revisions to Section 3.3, Air Quality (p 3.3-67) (new measure aa) and Section 3.8, Greenhouse Gases (p 3.8-72) (new measure k) and to Section 3.13, Noise (p 3.13-39) (new measure y).

**Response FED 1-4**

For responses related to the Connect SoCal Plan, please refer to Submission ID 0001464 of the Final Connect SoCal Plan.

**Response FED 1-5**

The comment requests additional information regarding the proposed Southern California Disadvantaged Communities Planning Initiative described in SMM AQ-1 including entities that would participate, potential eligibility criteria and the community engagement strategy. A significant challenge to the development and implementation of the RTP/SCS is the lack of comprehensive countywide and local active transportation plans which serve as the basis for regional active transportation planning. SCAG aims for all local jurisdictions to have high-quality, local active transportation plans as inputs to the regional planning process. The Southern California Disadvantaged Communities Planning Initiative

plays a critical role in achieving this goal by providing funding to develop a low-cost, high-impact model which leverages SCAG's staff, data, and outreach resources to deliver context-sensitive plans in high-need, low-resourced cities and unincorporated areas. Once developed, those plans can be integrated into existing and emerging regional active transportation infrastructure and frameworks. As part of the project, this model will be operationalized through the development of plans in seven communities and refined to provide a sustainable resource for SCAG staff to partner with local agencies to develop local active transportation plans.

Plan development is guided by robust community engagement, including the development of a Community Advisory Committee informing the direction of planning efforts (comprised of City staff, non- profits and community members), website development, community trainings, bicycle and pedestrian counts, a Living Preview Go Human Demonstration Event and feedback opportunities, artistic feedback installations, as well as postcards and web and print communications.

The following jurisdictions are included in SCAG's Disadvantaged Communities Active Transportation Planning Initiative: City of Stanton, City of Calipatria, City of Santa Fe Springs, Unincorporated Saticoy, City of Perris, City of Highland, City of Adelanto.

Jurisdictions were selected based on Disadvantaged Community scores, using the following criteria: SB 535/CalEnviroScreen Score, Environmental Justice Area Score, Communities of Concern Score, Native American Tribal Lands Score, and Median Income Score. Outreach was conducted with County Transportation Commissions to further refine priorities and staff assessed jurisdiction interest and capacity to participate in the initiative.

SCAG will extend our coordination with the U.S. EPA if it wishes to participate in the Southern California Disadvantaged Communities Planning Initiatives.

Regarding the commenter's recommendations on PMM-AQ-1(q), the measure has been revised. See **Chapter 10.0, Corrections and Additions**, for revisions to page 3.3-67 of Section 3.3, Air Quality. Regarding PMM-AQ-1(o), the measure already requires a traffic plan to "minimize traffic flow interference from construction activities" and "minimize obstruction of through-traffic lanes."



**Response FED 1-6**

The comment supports the robust set of mitigation measures provided in Section 3.8, Greenhouse Gases, and encourages the consideration of measures including in PMM GHG-1 in environmental justice communities. The mitigation measures included in the PEIR should be applied as applicable and feasible in all communities. Please see **Chapter 10.0, Corrections and Additions**, for revisions to page 3.8-72 of Section 3.8, Greenhouse Gas Emissions. New measure “k” encourages project sponsors to use the EJ Toolbox for potential measures to address impacts specific to low income/minority communities.

**Response FED 1-7**

The EPA requests a copy of the Final Plan and Final PEIR. Commenter will receive notice of the availability of the Final Plan and Final EIR and scheduled actions on the Connect SoCal Plan and PEIR.

**Letter STA 1: California Department of Transportation**

Paul Albert Marques  
Deputy District Director for Planning  
District 7  
100 S. Main Street, Suite 100  
Los Angeles, CA 90012

January 23, 2020

**Response STA 1-1**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001549-0001553* of the Final Connect SoCal Plan.

**Response STA 1-2**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001549-0001553* of the Final Connect SoCal Plan.

**Response STA 1-3**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001549-0001553* of the Final Connect SoCal Plan.

**Response STA 1-4**

The commenter requests that the hyperlink in footnote 75 (page 3.17-55) be corrected to remove “on October 25” from the clickable hyperlink. See **Chapter 10.0, Corrections and Additions**, for revisions to page 3.17-55 of Section 3.17, Transportation Traffic and Safety.

**Response STA 1-5**

The commenter requests clarification as to whether the discussion of the regional HOV system and park and ride system (Section 3.17, Transportation Traffic and Safety, page 3.17-8) includes High Occupancy Toll (HOT)/express lanes. The discussion of the regional HOV system including the identification of vehicle miles in Table 3.17-6 does include HOT/express lanes. However, there are an additional 160 miles of HOT lanes.

**Response STA 1-6**

The commenter identifies a potential location for a wildlife crossing at Conejo Grade around Camarillo and Thousand Oaks that should be looked at. The PEIR does not identify specific wildlife crossing locations, but Mitigation Measure PMM BIO-4 (m) and (n) does include wildlife crossings and fencing as potential mitigation:

“(m) Evaluate the potential for installation of overpasses, underpasses, and culverts to facilitate wildlife movement in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA’s Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities.”

and

“(n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.”

Mitigation Measure PMM BIO-4 identifies a number of wildlife mitigation strategies that lead agencies could use to mitigate impacts on wildlife.

**Response STA 1-7**

The commenter suggests that SCAG, Metro and Caltrans should fund projects that will improve culverts for wildlife use in rural areas of Ventura County. SCAG does not have authority to mandate agencies to fund specific mitigation measures and SCAG does not have project authority to impose mitigation measures.

**Response STA 1-8**

The commenter identifies additional possible wildlife crossings. See **Response STA 1-6**.

**Response STA 1-9**

The commenter identifies the need for fencing and habitat connectivity at a specific location. See **Response STA 1-6**.

**Response STA 1-10**

The commenter identifies the need for habitat connectivity at a specific location. See **Response STA 1-6**.

**Response STA 1-11**

The commenter indicates that access to parks and open space needs to be improved and suggests that buses at discount rates be provided to take people from the inner-city. Mitigation measure PMM REC-1 includes increasing the accessibility to natural areas and lands. SCAG does not have authority to mandate that agencies fund specific mitigation measures and SCAG does not have project authority to impose mitigation measures.

**Response STA 1-12**

The commenter indicates that beyond light rail and other transportation projects, agencies located in downtown Los Angeles and other large cities should consider alternative working hours and equip their staff to telecommute. SCAG does not have authority to mandate agencies to fund specific mitigation measures and SCAG does not have project authority to impose mitigation measures. Mitigation Measure PMM TRA-1 includes a number of Transportation Demand Management (TDM) strategies – alternative working hours and telecommuting can also help reduce VMT that would be appropriate mitigation for individual projects to include.

**Response STA 1-13**

The commenter indicates that Cal-Fire should have fire education for areas in cities that border open spaces and that training should be given to volunteers. Mitigation Measure PMM WF-1 (a) includes, “Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition. SCAG does not have authority to mandate agencies to fund specific mitigation measures and SCAG does not have project authority to impose mitigation measures on other agencies.

**Response STA 1-14**

The commenter suggests that SCAG encourage cities to capture and treat rainwater and release it in to dry ravines. SCAG does not have authority to mandate agencies to fund specific mitigation measures and SCAG does not have project authority to impose mitigation measures on other agencies. SCAG does have a Sustainability Program that is described in Mitigation Measure SMM USWS-1 and includes land use strategies that result in “Improved water quality, groundwater recharge and watershed health.” Mitigation measures have been revised to include strategies for stormwater and rainwater collection, infiltration, treatment and release. See **Chapter 10.0, Corrections and Additions**, for revisions to page 3.19.3-20 of Section 3.19.3, Utilities and Service Systems.

**Letter STA 2: California High Speed Rail Authority**

Margaret (Meg) Cederoth  
Director of Planning and Sustainability  
California High Speed Rail Authority  
770 L Street, Suite 620  
Sacramento, CA 95814

January 23, 2020

**Response STA 2-1**

The commenter provides introductory text. No specific response is required.

**Response STA 2-2**

For responses related to the Connect SoCal Plan, please refer to Submission ID 0001442 of the Final Connect SoCal Plan.

**Response STA 2-3**

The comment suggests Appendix 2.0 List of Plan Project be updated to reflect project costs for California High-Speed Rail Phase 1 system to \$38.96 billion. Revisions have been made to the Plan, please refer to the revised Connect SoCal Project List.

**Response STA 2-4**

The comment suggests Appendix 2.0 List of Plan Projects be updated to remove California High Speed Rail Phase 2 ENV/PE be removed from the financially constrained project list. Revisions have been made to the Plan, please refer to the revised Connect SoCal Project List.

**Response STA 2-5**

The commenter provides contact information. No specific response is required.

**Letter REG 1: John Wayne Airport**

Lea U. Choum, Planning Manager  
John Wayne Airport  
3160 Airway Avenue  
Costa Mesa, CA 92626

January 23, 2020

**Response REG 1-1**

This comment is a set of general introductory remarks restating the role of the John Wayne Airport, its participation in the RTP process as well as detailed to specific data submitted to SCAG by JWA. It presents no environmental issues and no specific response is required. The comment will be included as part of the record and forwarded to decision makers for their consideration in taking action on the Plan. No specific response is required.

**Response REG 1-2**

The comment suggests specific edits to Appendix 3.13 Aviation Noise Technical Report. Page 12 of Appendix 3.13 is revised to reflect to reflect the location of single-family land uses. See **Chapter 10.0, Corrections and Additions**, for Appendix 3.13 page 12 and 15.

**Response REG 1-3**

The comment suggests specific edits to Appendix 3.13 Aviation Noise Technical Report. Page 15 of Appendix 3.13 is revised to reflect this comment. See **Chapter 10.0, Corrections and Additions**, for page 12 and 15.

**Response REG 1-4**

The commenter provides contact information. No specific response is required.

**Letter REG 2: South Coast Air Quality Management District**

Wayne Nastri, Executive Officer  
South Coast Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

January 24, 2020

**Response REG 2-1**

This commenter provides introductory remarks and references detailed comments below. No specific response is required. Individual comments are responded to below.

**Response REG 2-2**

The comment refers to detailed comments on the Connect SoCal Plan attached to the letter with respect to the attainment challenge and the need for a new detailed approach to goods movement. For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001483, 0001506, and 0001515* of the Final Connect SoCal Plan.

**Response REG 2-3**

This comment provides a general summary of the comments below regarding potential under-estimated air quality impacts and use of SCAQMD's threshold for health risk assessment, these comments are responded to in detail below.

**Response REG 2-4**

The SCAQMD states that the agency will work collaboratively with SCAG to implement the Plan. No specific response is required.

**Response REG 2-5**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001483, 0001506, and 0001515* of the Final Connect SoCal Plan.

**Response REG 2-6**

The comment introduces Attachment 2 of the SCAQMD comment letter, which includes comments to the Draft PEIR. No specific response is required.

**Response REG 2-7**

The comment summarizes the Plan and anticipated growth within the region. No response is required.

**Response REG 2-8**

The commenter summarizes their concern that the Draft PEIR incorrectly compared on-road mobile source emissions for the existing conditions without the proposed project (2019) and the future conditions with the proposed project (2045) to determine significance. Commenter indicates that as a result, the emission reductions anticipated to occur independently of the Plan as a result of adopted state and federal regulations are improperly credited to the Plan. See **Response REG 2-18** for a comprehensive response to the issues raised in this summary comment. See also **Master Response 3 Baseline Conditions**.

**Response REG 2-9**

The commenter summarizes their concern that the Draft PEIR fails to compare the SCAQMD's portion of on-road mobile source emissions to the SCAQMD's regional significance thresholds to determine significance. See **Response REG 2-19** for a comprehensive response to the issues raised in this summary comment.

**Response REG 2-10**

The commenter summarizes their concern that the air quality analysis in the Draft PEIR included two analysis years: baseline (2019) and buildout year (2045). The SCAQMD recommends that interim analysis years (2020, 2030, and 2035) also be included within the analysis. See **Response REG 2-20** for a comprehensive response to the issues raised in this summary comment.

**Response REG 2-11**

The commenter summarizes their concern that the Draft PEIR discusses the SCAQMD's 2016 AQMP's forecasted emissions but did not quantify emissions from implementing Connect SoCal's transportation strategies for off-road emissions or land use strategies. The commenter asserts that since greenhouse gas (GHG) emissions were quantified for off-road vehicles, building energy, and water-related energy consumption, the air quality analysis is inconsistent with the GHG analysis and off-road emissions should be quantified. See **Response REG 2-21** for a comprehensive response to the issues raised in this summary comment.



**Response REG 2-12**

The commenter summarizes that the Draft PEIR failed to evaluate a scenario where construction activities overlap with operational activities. See **Response REG 2-22** for a comprehensive response to the issues raised in this summary comment.

**Response REG 2-13**

The commenter summarizes their concern that the Draft PEIR's health risk analysis failed to utilize the SCAQMD's CEQA significance threshold of 10 in a million. See **Response REG 2-23** for a comprehensive response to the issues raised in this summary comment.

**Response REG 2-14**

The commenter summarizes their recommendations regarding providing more information on the implementation and monitoring of Tier 4 construction equipment mitigation. See **Response REG 2-24** for a comprehensive response to the issues raised in this summary comment.

**Response REG 2-15**

The commenter summarizes their recommendations that SCAG include additional project-level mitigation measures to reduce on-road mobile source emissions. See **Response REG 2-25** for a comprehensive response to the issues raised in this summary comment.

**Response REG 2-16**

The commenter summarizes their recommendations that SCAG include project-level mitigation measures for off-road mobile sources. See **Response REG 2-26** for a comprehensive response to the issues raised in this summary comment.

**Response REG 2-17**

The commenter summarizes their concern that the Draft PEIR fails to include a discussion on how to disclose health risks and reduce exposures when new sensitive land uses are sited within 500 feet of freeways and recommends that the Draft PEIR include a discussion on the mobile source HRA analysis and health risk reduction strategies. See **Response REG 2- 27** for a comprehensive response to the issues raised in this summary comment.

**Response REG 2-18**

The comment suggests that the use of 2019 as the CEQA baseline to compare emissions to the Plan buildout in 2045 may have led to an underestimation of the air quality impacts resulting from Plan implementation and incorrectly assigns reduction credit of air emissions anticipated to occur independently of the Plan as a result of adopted state and federal regulations to the Plan. The SCAQMD recommends that the Draft PEIR compare emissions with and without the proposed project in interim analysis years and at full project buildout.

SCAG is responsible for providing a blueprint for transportation projects and land use development in the six-county region through the horizon year of 2045. Connect SoCal is a planning document that supports a combination of transportation and land use strategies to achieve reductions in emissions. As noted in the PEIR, on-road vehicle emissions are anticipated to decrease by the horizon year (2045). These reductions can be attributed to CARB regulations and efforts at implementing cleaner fuel standards and promoting lower emitting vehicles (CARB regulatory measures are listed on Section 3.3, Air Quality, [p 3.3-39 to 3.3-42]). The emission reductions from CARB regulations would occur regardless of the Plan. Evaluating a 2045 baseline condition in which only air quality reductions that can be attributed to the Plan, as recommended by the SCAQMD, would not provide valuable information to the public as the Connect SoCal Plan cannot be separated from any future scenario. The Plan does not take credit for any air quality rules, regulations, or technologies but includes them within the future year reductions as these controls cannot be separated from future emissions. Similarly, the EIR cannot separate out all emissions anticipated to occur only as a result of the Plan and compares all emissions in the future to all emissions occurring under existing conditions, thus providing a conservative analysis. For informational purposes the PEIR also compares future conditions with the Plan to future conditions without the Plan. Note that the emission results reported in the PEIR have accounted for the impact of the federal SAFE Vehicles Rule Part I.

The commenter recommends that SCAG revise the air quality analysis to calculate emissions in years 2020, 2030, and 2035 (GHG analysis years) with the Plan and emissions in those years without the Plan. See **Response REG 2-20** for a detailed response to the SCAQMD's recommendation regarding analysis of interim years between now and the Plan horizon year (2045).

**Response REG 2-19**

The commenter indicates that the PEIR should have compared the SCAQMD's portion of on-road mobile source emissions to the SCAQMD's regional thresholds in order to determine significance.

SCAQMD's thresholds were derived to apply to individual projects and not entire plan-level impact assessments. This is evident from their use in the SCAQMD's *1993 CEQA Thresholds Guide*, which

includes screening tables for individual land use development. Although the screening tables are obsolete because they were based on outdated emission factors, it is clear that the thresholds were intended to apply to specific projects. The SCAQMD has not developed thresholds more relevant to plan-level documents and, as a result, the thresholds are not appropriate for this type of analysis. Review of approved projects within the SCAQMD's jurisdiction demonstrates that these emission thresholds were used for specific land use development projects. The SCAB is approximately 4.2 million acres. Using the same thresholds for a single project covering a few acres and a regional transportation plan covering the entire SCAB region is not reasonable.

Rather than use thresholds appropriate to individual projects, the PEIR uses any increase in criteria pollutant emissions as the threshold of significance for the SCAG region. (This threshold is thus lower than SCAQMD's project thresholds.) This threshold is appropriate because of the large reductions in emissions anticipated to occur as a result of the state and federal emission controls previously discussed. Section 3.3, Air Quality (p 3.3-61), summarizes the significance finding as follows:

*While the SCAG region may see an increase in PM<sub>2.5</sub>, PM<sub>10</sub> and SO<sub>x</sub> emissions, the SCAQMD, AVAPCD, ICAPCD, and MDAQMD have not established regional thresholds to determine significance. The air districts within the SCAG region have only established project-level thresholds (see Table 3.3-9, Table 3.3-10, and Table 3.3-11). Therefore, individual projects must compare anticipated project emissions to the thresholds for the air district within which they are located in order to determine significance on the project-level. Because mobile source emissions of PM<sub>10</sub> and PM<sub>2.5</sub> will increase (PM<sub>10</sub> would increase in Imperial, Orange, Riverside, and San Bernardino Counties and PM<sub>2.5</sub> would increase in Imperial, Riverside, and San Bernardino Counties), largely as a result of increased total VMT, and SO<sub>x</sub> would increase in the region at least through 2031, the Plan could contribute to an air quality violation. Further, there is the potential for individual projects to exceed local standards during construction and/or operation for several pollutants. Therefore, this impact is considered to be significant.*

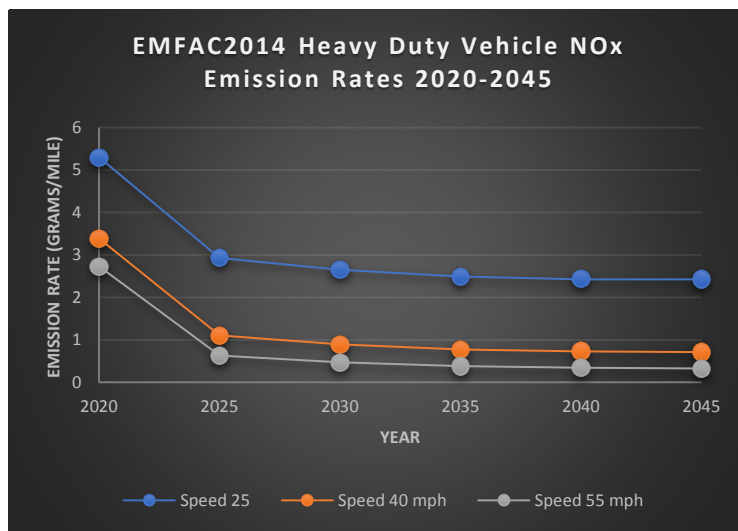
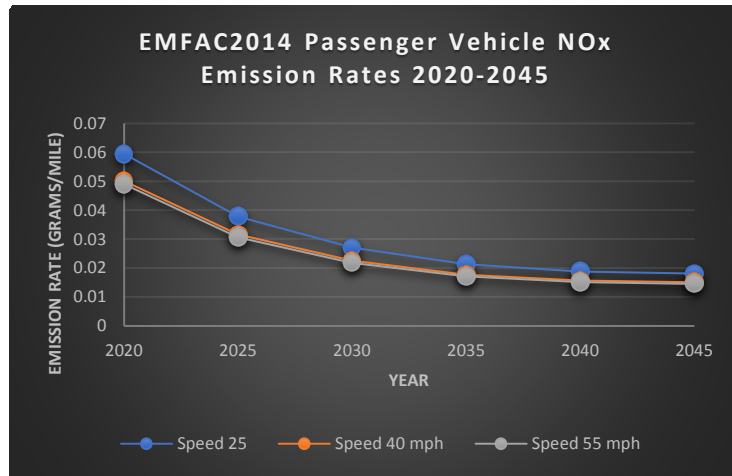
#### **Response REG 2-20**

The commenter indicates that the PEIR should have evaluated interim years of project implementation (2020, 2030, and 2035) to ensure that peak emissions are captured. Typically, an interim year analysis is undertaken for certain types of land use development projects that have known increments of development (e.g., a master plan with an identified number of residences to be constructed in specifically identified 5-year increments). However, for the Plan, the anticipated timing of new transportation and land use development projects is uncertain; the PEIR discloses reasonably expected development at the horizon of 2045. SCAG has a long-standing partnership with the SCAQMD and would welcome the opportunity to work with the air district to better align the AQMP with the Plan and PEIR.

GHG emissions were estimated for 2020 and 2035 because of the regulatory requirements to meet specific targets in these years. However, some assumptions had to be made regarding energy consumption rates, emission rates, etc. in order to provide best effort at emission estimates for these years. As explained in the GHG analysis methodology, “[w]hile the analysis considers regulations, programs, and policies currently in place, there is substantial uncertainty in projecting emissions for future horizon years.” (see Section 3.3, Air Quality (p 3.8-60)). Also, “as noted in the discussion above, the analyses of GHG emissions sources presented herein, even for transportation, do not fully take into account changes to fuels and technology that are expected to substantially reduce emissions compared to what is presented here.” Presenting such an analysis of GHGs allows for comparison of GHG emissions based on different types of development (MF housing is more efficient than single-family housing), so the analysis illustrates that the land use strategies reduce emissions, but the analysis does not provide a reasonable estimate of emissions because of the uncertainties.

The proposed transportation and anticipated land use development projects are spread across the entire six county region representing SCAG. The shorter the time increment of forecasts the less reliable they become. Economic cycles dramatically affect building and transportation and therefore regional-scale emissions. SCAG cannot reasonably anticipate if growth would be linear or sporadic between 2019 and 2045 or if the growth patterns would be similar across the entire region. Given the uncertainty in year-to-year growth, interim year emissions analyses are not useful.

On-road mobile source operational emission estimates were performed by SCAG, using EMFAC2014. (See **Master Response No. 4 Technical Process/Modeling** for discussion regarding the use of EMFAC2014) The emission rates built into the software account for incremental implementation of emission controls and fleet turnover, with emission rates substantially decreasing following the year 2020. As an example, the charts below show passenger vehicle and truck emission rates by year for NOx. The figures confirm the SCAQMD statement that the emission rates of vehicles, trucks, and equipment are generally higher in earlier years as more stringent emission standards and technologies have not been fully implemented, and fleets have not fully turned over. The emission rates sharply decline between 2020 and 2025 and then slowly decline between 2025 and 2045. Given the relatively small change in emission rates between 2025 and 2045, it is not anticipated that evaluating the Plan’s emissions in 2020, 2030, or 2035 would result in significantly different emission estimates than presented in Table 3.3-13, On-Road Mobile Source Criteria Air Pollutant Emissions by County – Existing Condition (2019) vs. Plan (2045). Characterizing an interim year scenario would not provide the public with any more valuable information than what is already presented.



**Response REG 2-21**

The commenter indicates that the PEIR inappropriately uses the SCAQMD’s 2016 AQMP forecasts of annual average off-road mobile emissions and stationary source emissions for years 2019, 2022, 2023, 2025, and 2031 in the Basin as a proxy for these emissions throughout the SCAG region. The SCAQMD states that the use of the 2016 AQMP forecasts is inappropriate.

CEQA does not require perfection, but rather adequacy, completeness, and a good faith effort at full disclosure. (See *CEQA Guidelines* § 15151). The forecasts contained in the AQMPs represent the best available information since SCAG is not responsible for, nor has expertise relevant to forecasting emissions from all the sources under the jurisdiction of the AQMPs.

SCAQMD indicates that the SCAQMD’s 2016 emissions are projections based on a 2012 base year therefore SCAG has discussed existing emissions but did not properly assess the incremental air quality impacts of direct emissions from implementing the Plan’s transportation strategies for off-road mobile

sources or land use strategies. Connect SoCal Plan is a ground-transportation plan and SCAG is responsible for evaluating on-road mobile source emissions from implementation of the Plan. Air quality management districts are responsible for evaluating future emissions from off-road and stationary sources. According to the 2016 AQMP Final PEIR,

*At the regional level, the SCAQMD is responsible primarily for non-vehicular sources and has limited authority over mobile sources (e.g., fleet regulations, incentives for accelerated vehicle turnover, reduction in average vehicle ridership, etc.). In addition, the SCAQMD has lead responsibility for developing stationary, some area, and indirect source control measures and coordinating the development and adoption of the 2016 AQMP.<sup>20</sup>*

SCAQMD (and other air districts) provide forecasts (as appropriate and applicable) of emissions from these sources as part of the AQMP update process. SCAG relies on the AQMDs to provide these estimates. The Plan is not anticipated to substantially alter off-road mobile or stationary source emissions. The RTP/SCS and AQMPs are complementary documents that regulate different sources of air emissions.

The commenter indicates that the 2016 AQMP only projects emissions until 2031 which is inappropriate for evaluating the Connect SoCal Plan with a planning horizon until year 2045. As indicated above, the SCAQMD is responsible for evaluating emissions from off-road mobile and stationary sources. The 2016 AQMP evaluates these emissions through 2031 because at that point the region is forecast to meet attainment for the federal 8-hour ozone standard. Use of the SCAQMD AQMP information provides an indication of how emissions are expected to change over at least a portion of the Connect SoCal Plan timeframe. SCAG's analysis is qualitative but uses this information to inform the analysis.

The commenter indicates that since SCAG covers six counties and five air pollution control districts, using SCAQMD's 2016 AQMP emissions as a proxy for the region is incorrect as only a portion of the region's emission were evaluated. While, the SCAB region geographically makes up approximately 17.3% of the SCAG region, the SCAB region is home to over 17 million people.<sup>21</sup> This is approximately 90% of the population in the SCAG region (based on the 2016 population). Furthermore, the SCAQMD includes all of Orange County, the majority of Los Angeles County, and the non-desert portions of Riverside and San Bernardino Counties. Looking at on-road mobile source emissions from just Los Angeles and Orange Counties from Table 3.3-13 demonstrates that these two counties represent approximately 66% of the SCAG area's annual ROG emissions, 57% of the SCAG area's annual NOx emissions, 68% of the SCAG

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<sup>20</sup> SCAQMD. 2016. *2016 AQMP Final Program EIR*, see p. 2-7.

<sup>21</sup> SCAQMD. *About*. Available online at: <http://www.aqmd.gov/nav/about>, accessed February 6, 2020.

area's winter CO emissions, and 66% of the SCAG area's annual PM10, PM2.5, and SOx emissions under existing conditions. The percentages of horizon year emissions generated in Los Angeles and Orange Counties compared to the SCAG region is similar to existing conditions. Therefore, since the majority of the population resides within the SCAB and the majority of emissions are generated within the SCAB, it was determined that the emissions identified in the 2016 AQMP would serve as a good proxy for the remaining portions of the region. In addition, a discussion of the stationary source and off-road mobile emissions from the VCAPCD, AVAQMD/MDAQMD, and the ICAPCD is included under Impact 2 of Section 3.3, Air Quality.

See **Chapter 10.0, Corrections and Additions**, for the following changes: 1) Information regarding the VCAPCD, AVAQMD/MDAQMD, and the ICAPCD's forecasted annual average emissions from their respective AQMPs is added to Section, 3.3, Air Quality (p 3.3-55 to 3.3-59); 2) Information regarding off-road mobile source emissions forecasted from these AQMPs is added to Section 3.3, Air Quality (page 3.3-61 to 3.3-63.; 3). Information regarding stationary source emissions forecasted from these AQMPs is added to Section 3.3, Air Quality (page 3.3-64 to page 3.3-66. 4). Information summarizing the forecasted annual average emissions from these AQMPs is added to page 3.3-69.

The commenter indicates that quantifying air quality emissions, emissions from both construction and operations should be calculated and SCAG should use its best efforts to identify and quantify a worst-case construction and operational air quality impact scenario. The SCAQMD further states SCAG should develop a construction scenario for land use development and quantify these emissions and compare the emissions to the air districts' regional air quality CEQA significance thresholds in order to determine significance. The Connect SoCal Plan includes a 25-year buildout for the 38,000 square mile SCAG region. At this time no more construction details are known and due to the size of the region and duration of the Plan, and as such, estimating a construction schedule for individual projects as well as the associated emissions would be speculative. Also, emissions from the equipment used for existing construction, will get cleaner over time and it is likely that total emissions associated with construction will decrease over the course the Plan. The PEIR provides a qualitative discussion of construction emissions, and as noted, "SCAQMD does account for estimated construction emissions from off-road construction equipment within the 2016 AQMP." See **Response REG-22** for a more detailed comment regarding the speculative nature of calculating these emissions. Moreover, as discussed in **Response REG 2-20**, the worst-case operational emissions will likely occur during the baseline year due to emission reductions for light-duty and heavy-duty trucks increasingly taking affect as time progresses.

The commenter recommends that SCAG quantify off-road vehicle emissions and add those emissions to on-road sources to determine the level of significance. As noted above, the SCAQMD states within the 2016 AQMP that the SCAQMD is responsible for non-vehicular sources and for developing stationary,

some area, and indirect source control measures. Review of the SCAQMD's 2016 AQMP Final PEIR demonstrates that on-road mobile source emissions were estimated based on SCAG's 2016-2040 RTP/SCS. However, the off-road emissions were estimated based on emissions inventories from CARB for off-road equipment which includes construction, mining, gardening and agricultural equipment, ocean-going vessels, commercial harbor craft, locomotives, and cargo handling equipment. The SCAQMD estimated aircraft operations with coordination with the local airport authorities. Thus, SCAG relies on SCAQMD's data for estimating off-road mobile source emissions and a discussion of these emissions based on the SCAQMD's 2016 AQMP is included within the Draft PEIR. Other air districts provide less information than SCAQMD; a discussion of off-road mobile source emissions from all air districts within the SCAG region based on available information is included in the PEIR (see Section 3.3, Air Quality (p 3.3-55 to 3.3-66)).

#### **Response REG 2-22**

The commenter indicates that since the Plan is expected to occur over a period of 20 years (actually 25 years), overlapping construction and operation impacts from transportation and land use projects is reasonably foreseeable and should be evaluated and compared to the SCAQMD mass daily thresholds for operations. The comment is based on the concept that when specific development is reasonably foreseeable, the Lead Agency should identify potential air quality impacts and sources of air pollution that could occur.

As discussed in **Response 2-21**, construction activity is occurring at present with construction equipment that has higher emissions rates than will occur in the future. Further as discussed in **Response 2-20**, specific development of individual projects (size, construction activity and timing) in the future is not reasonably foreseeable as there is no comprehensive timeline for individual projects within the six-county region. The anticipated timing of land use changes and new development is uncertain, especially over short time frames because of the effect of economic cycles, and therefore, the PEIR focuses on identifying reasonably foreseeable on-road mobile source emissions in the Plan's horizon year (2045), see Table 3.3-13, On-Road Mobile-Source Criteria Air Pollutant Emissions by County – Existing Condition (2019) vs Plan (2045).

The exercise of estimating existing and future construction activity for purposes of estimating changes in emissions would be speculative and would involve evaluating the incremental increase in daily construction activity (i.e., specific inventories of equipment and haul trucks under existing conditions as well as with and without implementation of the Connect SoCal Plan in the horizon year as well as interim years) across the entire SCAG region. Without a comprehensive understanding of the schedules and sizes of individual projects, this exercise would not bolster the programmatic discussion of regional air quality



impacts that is already provided (See **Master Response No. 2 Program EIR vs Project EIR**). As discussed above, the AQMDs are responsible for regulating emissions from non-mobile sources as well as construction vehicles. The PEIR provides a qualitative discussion of construction emissions as well as total emissions based on SCAQMDs estimates of total emissions in the SCAB (through the year 2031) contained in the AQMP EIR.

Note that in recent publicly available plan-level environmental documents for projects within the SCAQMD jurisdiction, construction emissions were not quantified.<sup>22</sup>

### **Response REG 2-23**

The commenter indicates that the Draft PEIR's method of determining the significance of the health risk is incorrect. The Draft PEIR determined that the health risk posed to sensitive receptors near freeway segments would be less than significant due to the decrease in cancer risk from baseline emissions. The commenter asserts that the SCAQMD's CEQA significance threshold of 10 in a million should be used to determine significance.

Contrary to the commenter's statement, SCAQMD's cancer risk threshold was used to determine project impacts. The SCAQMD's thresholds state that the cancer risk threshold is "Maximum Incremental Cancer Risk  $\geq$  10 in 1 million."<sup>23</sup> Review of Table 9, Maximum Exposed Individual Residential Cancer Risk for 30-Year Exposure in Appendix 3.3, Health Risk Technical Report, demonstrates that the incremental cancer risk from baseline conditions (2019) and Project Build-out (2045) will decrease at each segment and therefore will not exceed an incremental cancer risk of 10 in a million. Comparing baseline conditions (2019) and Project Build-out (2045) demonstrates that the cancer risks will be reduced from anywhere from 5.7 in a million (Segment 9) to 80.6 in a million (Segment 16). Therefore, since the incremental cancer risk does not exceed 10 chances in a million and actually decreases as compared to baseline emissions, the health risk posed to receptors near these heavily trafficked roadways remains less than significant. See also **Response REG 2-18** regarding the appropriate baseline for comparison of impacts.

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<sup>22</sup> Santa Monica Downtown Community Plan Draft EIR (2017) available at <https://www.smgov.net/Departments/PCD/Environmental-Reports/Downtown-Community-Plan-Program-EIR/>, Pomona General Plan Update and Corridor Specific Plan (2013) available at: [https://www.ci.pomona.ca.us/mm/comdev/plan/pdf/GPUP-DEIR-Volume\\_I.pdf](https://www.ci.pomona.ca.us/mm/comdev/plan/pdf/GPUP-DEIR-Volume_I.pdf), San Pedro Community Plan Draft EIR (2012) available at <https://planning.lacity.org/development-services/eir/san-pedro-new-community-plan-0>, or were quantified but were not combined with operational emissions (e.g., South Glendale Community Plan Draft EIR (2017) available at <https://www.glendaleca.gov/government/departments/community-development/planning/community-plans/sgcp-eir>.

<sup>23</sup> SCAQMD. *South Coast AQMD Air Quality Management Thresholds*. Available online at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>.

**Response REG 2-24**

The commenter recommends revisions to PMM-AQ-1 q) to provide more details on the requirement for Tier 4 construction equipment, provide guidance on project-level implementation and monitoring, and facilitate CEQA streamlining and tiering from the PEIR for subsequent, project-level environmental analyses. See **Chapter 10.0 Corrections and Additions** for changes to Section 3.3, Air Quality (p 3.3-67).

**Response REG 2-25**

The commenter provides a list of project-level mitigation measures to be included in the PEIR. See **Chapter 10.0, Corrections and Additions**, for changes to Section 3.3, Air Quality (p 3.3-67), and mitigation measures added to the PEIR.

The following suggested measures are not incorporated into the Final PEIR. An explanation is provided for each measure:

- Require zero-emissions (ZE) or near-zero (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet CARB's adopted optional NO<sub>x</sub> emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. At a minimum, require that vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export) that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter and 0.20 g/bhp-hr of NO<sub>x</sub> emissions or newer, cleaner trucks. When requiring ZE or NZE on-road haul trucks, SCAG should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final PEIR, where appropriate. To monitor and ensure ZE, NZE, or 2010 model year or newer trucks are used, require that operators maintain records of all trucks associated with the operation, and made these records available to SCAG upon request. The records will serve as evidence to prove that each truck called met the minimum 2010 model year engine emission standards. Alternatively, require periodic reporting and provision of written records by operators, and conduct regular inspections of the records to the maximum extent feasibly and practicable.

This suggested mitigation measure would require a massive turnover of the private on-road haul truck vehicle fleet from older engines to new zero-emissions or near-zero emission trucks. These trucks are not readily available across the SCAG region and not in the numbers that would support the intensity of construction activities that will occur under the Connect SoCal Plan and across the entire SCAG region. The SCAQMD already has rules that are relevant to certain vehicle fleets (e.g., Rule 1196 (Clean On-Road Heavy-Duty Public Fleet Vehicles) and the CARB has regulations applicable to truck emissions (e.g., Heavy-Duty (Tractor-Tractor) Greenhouse Gas Regulation).

- Enter into applicable bid documents, purchase orders, and contracts to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with CARB policy. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify

construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the site. To further ensure that drivers understand the vehicle idling requirement, post signs at the site, where appropriate, stating that idling longer than five minutes is not permitted.

Most construction projects located within the SCAG region are required to comply with SCAQMD 403 (Fugitive Dust), which ensures comprehensive control of fugitive dust emissions in the South Coast Air Basin. Restrictions on idling are already required<sup>24</sup> and PMM AQ-1 bullet (l) includes minimizing idling to 5 minutes to save fuel and reduce emissions.

- Require at least 5 percent of all vehicle parking spaces include electric vehicle (EV) charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. Electrical hookups should be provided at the onsite vehicle stop for to plug in any onboard auxiliary equipment. Electrical panels should be appropriately sized to allow for future expanded use.

Mitigation Measure PMM GHG-1 (See Section 3.8, Greenhouse Gases) already includes reference to CALGreen including installing electric charging stations (bullet ix).

#### **Response REG 2-26**

The commenter provides a further list of project-level mitigation measures to be included in the PEIR to address off-road mobile source emissions. See **Chapter 10.0, Corrections and Additions**, for changes to Section 3.3, Air Quality (page 3.3-67) and mitigation measures added to the PEIR.

The following measure is not incorporated into the Final EIR.

- Encourage and incentivize aircraft operators to route the cleanest aircraft engines to serve the South Coast Air Basin.

As explained in the Connect SoCal Aviation and Airport Ground Access Technical Study, “as a metropolitan planning organization (MPO), SCAG by definition is primarily a regional surface transportation planning agency.” The following measure goes beyond the scope of SCAG’s authority and is not under SCAG’s jurisdiction. The SCAG region has seven commercial airports and 40 reliever, general aviation, and other public use airports. Three of these airports service not only domestic flights, but also international flights. SCAG is an MPO focused on surface transportation, as a result, does not have the authority to develop mitigation to encourage the cleanest aircraft to serve the SCAB region.

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<sup>24</sup> The Diesel-Fueled Commercial Motor Vehicle Idling Airborne Toxic Control Measure (ATCM) was adopted in 2006 by the California Air Resource Board (CARB) to limit the idling of diesel-fueled commercial motor vehicles to reduce diesel emissions. See the following (accessed February 19, 2020):

<http://scap1.org/Air%20Reference%20Library/Comm%20Vehicle%20Idling%20Facts.pdf>  
<https://ww3.arb.ca.gov/regact/hdvidle/hdvidle.htm>

**Response REG 2-27**

The commenter indicates that since implementation of the Plan would result in the development of new transportation projects near existing sensitive receptors or locating new receptors near transportation projects, a mobile source health risk analysis (HRA) should be performed to disclose the potential health risks for new sensitive land uses that will be sited within 500 feet of freeways or other sources of pollution.

As the commenter notes there have been a number of court rulings that emphasize that CEQA should address impacts of the project on the environment and not impacts of the environment on the project, the court found that in particular impacts of locating sensitive receptors near freeways is not a significant impact unless the project exacerbates the impact.<sup>25</sup> As discussed in the PEIR (summarized on Section 3.3, Air Quality (page 3.3-80)), health risk associated with mobile source emissions would decrease substantially over the timeframe of the Plan. See also **Response REG 2-18** regarding appropriate baseline. However, also as summarized on page 3.3-80 emissions from construction are considered significant as construction would occur where projects occur and would impact individual sensitive receptors. Since CEQA does not require evaluation of impacts of the environment on a project each lead Agency must determine how to best protect future residents in proximity to sources of TACs. As noted in the Section, 3.3, Air Quality (page 3.3-73):

*Consistent with CARB recommendations, it is anticipated that local governments would limit growth within 500 feet of freeways and/or address potential health concerns through appropriate design requirements. For example, in the City of Los Angeles, all new mechanically ventilated buildings located within 1,000 feet of freeways are required to install air filtration media that provides a Minimum Efficiency Reporting Value (MERV) of 13. [See Los Angeles Municipal Code § 99.04.504.6.] In addition, properties within 1,000 feet of freeways are subject to an advisory notice regarding adverse health impacts resulting from chronic exposure to vehicle exhaust and particulate matter. ...*

The HRA performed for the PEIR is summarized on Section 3.3, Air Quality (p 3.3-72 through 3.3-80), and presented in full in Appendix 3.3, Health Risk Assessment Technical Report. The HRA includes calculations of the cancer risks to the most impacted existing sensitive receptors (residential, worker, school, day care, and senior care facility) as a result of mobile-source emissions. The transportation segments were chosen based on the highest volumes of heavy-duty trucks and the proximity of sensitive receptors. The risks were calculated for receptors within 1,000 meters of the transportation segment, with the most impacted receptors being closest to the source of emissions. Since the sixteen segments analyzes

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<sup>25</sup> California Supreme Court's decision in *California Building Industry Association v Bay Area Air Quality Management District*, (S213478, December 17, 2015) and California Court of Appeals decision in *California Building Industry Association v Bay Area Air Quality Management District*, (August 12, 2016).

are anticipated to have the highest heavy-duty truck volumes, the health risk analysis provides a conservative cancer risk estimate for receptors within 500 feet of a freeway.

The commenter also provides project-level mitigation measures to be included in the Final PEIR to address off-road mobile source emissions. See **Chapter 10.0, Corrections and Additions**, for changes to page 3.3-67 and mitigation measures added to the PEIR.

**Response REG 2-28**

The commenter requests detailed written responses to their comments and that statements be supported by factual information and that if changes to mitigation measures are found infeasible substantial evidence be provided for rejecting them. The commenter is referred to the responses above. See also **Master Response No. 2 Program EIR vs. Project EIR**.

**Letter REG 3: Ventura County Air Pollution Control District**

Nicole Collazo  
Planning Division  
669 County Square Drive  
Ventura, California

January 23, 2020

**Response REG 3-1**

This comment provides introductory text summarizes the Connect SoCal project. No specific response is required.

**Response REG 3-2**

The comment suggests adding “motor vehicle” to the table heading. See **Chapter 10.0, Corrections and Additions**, for Section 3.3, Air Quality (p 3.3-19).

**Response REG 3-3**

The comment relates to air quality threshold b in the Appendix G checklist. While the specific question is not required under CEQA, lead agencies have discretion to use thresholds specific for their project. (See *CEQA Guidelines* Section 15064.7(b) “Lead agencies may also use threshold on a case-by case basis). In this case, the threshold “violate any air quality standard or contribute to an existing or projected air quality violation” was selected by SCAG as it affords an opportunity to disclose regional air quality impacts and the relationship to air quality standards. See also **Master Response 2: Program EIR vs. Project EIR**.

**Response REG 3-4**

The comment clarifies nonattainment status for SSAB. See **Chapter 10.0 Corrections and Additions** for Section 3.3, Air Quality (p 3.3-56).

**Response REG 3-5**

The comment updates information regarding Ventura County’s CAP. See **Chapter 10.0 Corrections and Additions** for Section 3.3, Air Quality (p 3.8-49).

**Response REG 3-6**

The comment suggests an edit to Table 3.8-4, California Jurisdictions Addressing Climate Change. See **Chapter 10.0, Corrections and Additions**, for Section 3.3, Air Quality (p 3.8-58).

**Response REG 3-7**

The comment provides details of the Thomas Fire that occurred in December of 2017 and burned 281,893 acres which was bigger than the Woolsey Fire (November 2018, burned 96,949 acres) discussed on page

3.8-67. The comment does not raise a new issue but rather provides information on another illustration of the issue already discussed in the PEIR. No specific response is required.

**Letter SUB 1: Orange County Council of Governments**

Stacy Berry, Chair  
Orange County Council of Governments (OCCOG)  
3972 Barranca Parkway, Ste. J127  
Irvine, CA 92606

January 23, 2020

**Response SUB 1-1**

This comment is a set of general introductory remarks. It presents no environmental issues within the meaning of CEQA and no specific response is required. Individual comments are responded to below. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

**Response SUB 1-2**

This comment expresses support for comments from OCTA, TCA, and Center for Demographic Research. Commenter is referred to specific responses for those letters.

**Response SUB 1-3**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001465, 0001467-0001469, 0001475, 0001476, 0001479, 0001480, 0001482, 0001484-0001486, 0001488, 0001490, 0001491, 0001493-0001495, and 0001497* of the Final Connect SoCal Plan.

**Response SUB 1-4**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001465, 0001467-0001469, 0001475, 0001476, 0001479, 0001480, 0001482, 0001484-0001486, 0001488, 0001490, 0001491, 0001493-0001495, and 0001497* of the Final Connect SoCal Plan.

**Response SUB 1-5**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001465, 0001467-0001469, 0001475, 0001476, 0001479, 0001480, 0001482, 0001484-0001486, 0001488, 0001490, 0001491, 0001493-0001495, and 0001497* of the Final Connect SoCal Plan.



**Response SUB 1-6**

The comment expresses opposition to PEIR alternatives that do not use local input. Commenter is referred to **Master Response No. 8 Alternatives**. As described in Chapter 4.0 Alternatives, of the PEIR, SCAG as the lead agency is required to develop a reasonable range of alternatives that 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. In accordance with the *CEQA Guidelines*, the following factors may be used to eliminate alternatives from consideration by the lead agency: (1) failure to meet most of the basic project objectives; (2) infeasibility, or (3) inability to avoid significant environmental impacts. Generally, the alternatives represent a progression of land use and transportation investments, such that the Existing-Plans Local Input Alternative includes the most dispersed land use and fewest transportation investments and Intensified Land Use Alternative represents the most compact land use pattern but maintains the same transportation investments as the Plan. Connect SoCal falls in between these two alternatives. As stated above, all alternatives analyzed accommodate the same amount of regional growth as the Plan.

The Plan and Alternative 2 Existing Plans Local Input, both incorporate local input with respect to growth forecasts. As part of preparation of the Final Plan and Final PEIR the local input growth forecasts for the Plan have been refined to further reflect the wishes of local jurisdictions including input received to reflect existing development agreements, entitlements, and projects recently completed or under construction.

The comment also requests additional information on the datasets and RHNA methodology. See **Master Response No. 7: Regional Housing Needs Assessment**.

**Response SUB 1-7**

The comment suggests SCAG avoid naming specific technologies in the Plan and PEIR. Please see **Master Response No. 1: General Comments and Non-CEQA Issues**. Where specific technologies are identified, they are used as examples of the types of technologies that could occur. In many instances, providing a name for a technology (i.e., Uber or Lyft) assists the reader in understanding the referenced technology; SCAG is not expressing a preference for these particular technologies. Commenter is also referred to **Master Response No. 5: Approach to Mitigation Measures** which clarifies that mitigation measures are intended to be flexible, as such any technology can be replaced with a comparable technology that achieves the same result.

**Response SUB 1-8**

The comment indicates that opinion, as well as dramatic and biased language should be removed from the PEIR. The PEIR is a factual unbiased document. No language is intended to be biased, or overly dramatic. The PEIR generally represents an overview of the science of a topic and presents it within the seriousness of the context. The comment and its associated attachment include specific suggested text changes. These changes are incorporated where appropriate. See **Responses SUB 1-17 through SUB 1-65** and responses to **Letter ORG-9** from the Center for Demographic Research.

**Response SUB 1-9**

The comment suggests specific changes to all mitigation measures. Commenter is referred to **Master Response No. 5: Approach to Mitigation Measures**. Consistent with the provisions of § 15091(a)(2) of the *State CEQA Guidelines*, the scope of SCAG’s responsibility as a Lead Agency to identify feasible mitigation measures is described in Section 1.6 of the Introduction to the PEIR. Similarly, Section 1.6 of the Introduction to the PEIR describes the limits of SCAG’s authority and the discretion of Lead Agencies responsible for the consideration of approval of subsequent projects. Furthermore, SB 375 specifically provides that nothing in an SCS supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use policies and regulations, including their general plans, to be consistent with the SCS or an alternative planning strategy.<sup>26</sup> Moreover, cities and counties have plenary authority to regulate land use through their police powers granted by the California Constitution, art. XI, §7, and under several statutes, including the local planning law,<sup>27</sup> the zoning law,<sup>28</sup> and the Subdivision Map Act.<sup>29</sup> As such, SCAG has no concurrent authority/jurisdiction to implement mitigation related to land use plans and projects that implement the Plan. With respect to the transportation projects in the Plan, these projects are to be implemented by Caltrans, county transportation commissions, local transit agencies, and local governments (i.e., cities and counties), and not SCAG. SCAG also has no authority/jurisdiction to require these agencies to implement project-specific mitigation measures.

Regarding the request to delete “can and” from “can and should consider” in the project-level mitigation measures, see **Master Response No. 5: Approach to Mitigation Measures**.

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<sup>26</sup> California Legislative Information. *Public Resources Code – PRC, Division 13. Environmental Quality, Chapter 2.5. Definitions [21060-21074]*.

<sup>27</sup> California Legislative Information. *Chapter 3. Local Planning 65100-65763*.

<sup>28</sup> California Legislative Information. *Chapter 4. Zoning Regulations 65800-65912*.

<sup>29</sup> California Legislative Information. *Division 2 Subdivisions 66410-66499.38*.

Regarding the recommendation to add “consider where applicable and feasible” to all mitigation measures, in the methodology for each technical section, there is the following paragraph which applies to all mitigation measures:

*The mitigation measures in the PEIR are divided into two categories: SCAG mitigation and project-level mitigation measures. SCAG mitigation measures shall be implemented by SCAG over the lifetime of the Plan. For projects proposing to streamline environmental review pursuant to SB 375, SB 743 or SB 226 (as described in Section 1.0 Introduction), or for projects otherwise tiering off this PEIR, the project-level mitigation measures described below (or comparable measures) can and should be considered and implemented by Lead Agencies and Project Sponsors during the subsequent, project- or site-specific environmental reviews for transportation and development projects **as applicable and feasible**. However, SCAG cannot require implementing agencies to adopt mitigation, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation.*

Consistent with CEQA requirements and the intent of SCAG, the PEIR does not require mitigation measures that are inapplicable or infeasible. Rather the PEIR presents options for projects that wish to use the PEIR for streamlining purposes. Mitigation measures are written in broad and general terms so that they may be tailored to project-specific circumstances and the judgment of local jurisdictions.

#### **Response SUB 1-10**

The comment relates to mitigation measures that overlap with regulations. Refer to **Master Response No. 5: Approach to Mitigation Measures**.

#### **Response SUB 1-11**

The comment suggests replacing the word “cities” with the word “jurisdictions” where appropriate. It is generally understood that the SCAG region includes both cities and counties, a sentence has been added to the Introduction to add “and counties” after the word “cities” See **Chapter 10, Corrections and Additions**, for Chapter 1.0, Introduction (p 1.0-3).

#### **Response SUB 1-12**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001465, 0001467-0001469, 0001475, 0001476, 0001479, 0001480, 0001482, 0001484-0001486, 0001488, 0001490, 0001491, 0001493-0001495, and 0001497* of the Final Connect SoCal Plan. The first use of an acronym in the PEIR is usually spelled out. Both the PEIR and Plan also include a glossary and many sections define technical terms at the beginning of each section (i.e., Section 3.3, Air Quality – Definitions).

**Response SUB 1-13**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001465, 0001467-0001469, 0001475, 0001476, 0001479, 0001480, 0001482, 0001484-0001486, 0001488, 0001490, 0001491, 0001493-0001495, and 0001497* of the Final Connect SoCal Plan.

SCAG has provided the corrected sources for the requested tables. See **Chapter 10 Corrections and Additions**.

**Response SUB 1-14**

The comment relates to measures that include new fees and/or taxes. Please refer to **Master Response No. 5: Approach to Mitigation Measures** as well as **Response 1-9** above which clarify that mitigation measures can be replaced with any comparable measure and are therefore not strictly required to be implemented as drafted. Lead agencies have the full discretion to apply those measures that are appropriate and feasible. The mitigation approach in this PEIR recognizes the importance of project-level mitigation measures to minimize project-level significant effects while maintaining flexibility for consideration and/or implementation by project-level lead agency. With respect to financing, fees and taxes, local lead agencies are responsible for drafting, implementing and developing a nexus study including documenting the anticipated effectiveness of a fee or tax.

**Response SUB 1-15**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001465, 0001467-0001469, 0001475, 0001476, 0001479, 0001480, 0001482, 0001484-0001486, 0001488, 0001490, 0001491, 0001493-0001495, and 0001497* of the Final Connect SoCal Plan.

**Response SUB 1-16**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001465, 0001467-0001469, 0001475, 0001476, 0001479, 0001480, 0001482, 0001484-0001486, 0001488, 0001490, 0001491, 0001493-0001495, and 0001497* of the Final Connect SoCal Plan.

**Response SUB 1-17**

The comment relates to the heading of the commenter's table and requires no response.

**Response SUB 1-18**

The comment relates to PEIR mitigation measures. Please see **Master Response No. 5: Approach to Mitigation Measures**.

**Response SUB 1-19**

The comment suggests an update to the regional investment number. See **Chapter 10, Corrections and Additions** for Executive Summary (p ES-4).

**Response SUB 1-20**

The comment suggests adding the words “to replace the gas tax” to the discussion. The suggested edit was not made as the statement suggested is not relevant to the text. Please see **Response SUB 1-14**.

**Response SUB 1-21**

The comment suggests adding toll roads to the list of roadways. See **Chapter 10.0 Corrections and Additions** for Executive Summary, page ES-11.

**Response SUB 1-22**

Commenter suggests that air quality mitigation measures defer to AQMDs or local jurisdictions. See **Master Response No. 5: Approach to Mitigation Measures** as well as **Response SUB 1-9**. Note that two air districts as well as many jurisdictions did comment on the PEIR. SCAQMD had suggestions for additional mitigation which have been incorporated (Please refer to **Responses REG 2-25 to 2-28** and **Chapter 10.0, Corrections and Revisions**).

**Response SUB 1-23**

The comment relates to mitigation measure PMM AES-3 (b) the measure has been revised to reflect the comment. See **Chapter 10.0, Corrections and Additions**, for page 3.1-40 of the PEIR.

**Response SUB 1-24**

The comment relates to the analysis under Impact AQ-1 provided in the Executive Summary. Commenter is referred to Section 3.3, Air Quality (p 3.3-51 through 3.3-53), which provides the substantial evidence for the less than significant conclusion regarding the potential to conflict with or obstruct implementation of applicable air quality plans. As stated on page 3.1-52, the goals of the air quality management plans and attainment plans are to establish a strategy for achieving the standards by a set date by listing all feasible control measures, including transportation control measures. These control measures help advance the attainment date and are financially, economically, and socially feasible. As standards become more stringent over time, achieving the standards becomes a moving target that the air quality districts, and air-related plans must continue to chase. At this current snapshot of time (2019), the Plan would not

conflict with the existing air-related plans since it will align with feasible Transportation Control Measures (TCMs). SCAG coordinates with air districts in the region to ensure that air quality management plans (and air pollution control plans) are consistent and comprehensively address air pollution from all sources (as appropriate) in the SCAG region. For example, the 2016 SCAQMD AQMP was developed in alignment with the 2016 RTP/SCS, incorporating the latest scientific, technological, and regulatory information and planning assumptions as of January 17, 2017. Revisions are not required.

#### Response SUB 1-25

The comment relates to PMM AQ-1. Rule 403 is discussed in the regulatory framework in Section 3.3, Air Quality. As stated on Section 3.3, Air Quality (p 3.3-44), “The SCAQMD, AVAQMD, and MDAQMD have adopted Rule 403, Fugitive Dust, which requires the implementation of best available fugitive dust control measures during construction and operational activities capable of generating fugitive dust emissions from on-site earth-moving activities, construction/demolition activities, and mobile equipment traveling on paved and unpaved roads.<sup>30</sup> Similarly, VCAPCD has adopted Rule 55, Fugitive Dust,<sup>31</sup> and ICAPCD has adopted Rule 800, General Requirements for Control of Fine Particulate Matter (PM10),<sup>32</sup> and Rule 801, Construction and Earthmoving Activities, to reduce fugitive dust.<sup>33</sup>” Rule 403 does not need to be called out in any specific measure as compliance with Rule 403 is mandatory and assumed to occur. Revisions are not required.

#### Response SUB 1-26

Commenter references PMM AQ-1(q) and requests clarification with respect to AQMD. There are no current requirements to use Tier 4 construction equipment and no requirements regarding use of equipment near sensitive receptors. See **Master Response No. 5: Approach to Mitigation Measures** and **Response SUB 1-9** above.

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<sup>30</sup> AQMD. *Rule 403. Fugitive Dust*. Available online at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>, accessed August 23, 2019.

<sup>31</sup> VCAPCD. 2008. *Rule 55 – Fugitive Dust*. Available online at: <http://www.vcapcd.org/Rulebook/Reg4/RULE%2055.pdf>, accessed August 23, 2019.

<sup>32</sup> ICAPCD. 2012. *Rule 800 General Requirements for Control of Fine Particulate Matter (PM-10)*. Available online at: <https://www.co.imperial.ca.us/AirPollution/RULEBOOK/RULES/1RULE800.pdf>, accessed August 23, 2019.

<sup>33</sup> ICAPCD. 2005. *Rule 801 Construction and Earthmoving Activities*. Accessed online at: <https://www.co.imperial.ca.us/AirPollution/RULEBOOK/RULES/1RULE801.pdf>, accessed August 23, 2019.

**Response SUB 1-27**

The comment suggests mitigation measures should refer to permitting agencies and local regulations for biological resources. As stated on page 3.4-70 of the PEIR, all projects within the SCAG region would be subject to the provisions of the Federal and State ESAs, as well as Sections 1900–1913, 3511, 4150, 4700, 5050, 5515 of the State Fish and Game Code and Sections 80071–80075 of the State Food and Agriculture Code. Similar language referring to each of the resource agencies is included in each of the biological resources impact discussions, see page 3.4-77 and 3.4-83.

Further, measure PMM BIO-2 refers to USFS, CDFW, USFWS, local jurisdictions, local agencies, and landowners. Measure PMM BIO-3 refers to SWRCB, CDFW, USACE, therefore, no revisions are required. Refer to **Master Response No. 5: Approach to Mitigation Measures**.

**Response SUB 1-28**

The comment relates to analysis of Impact AQ-4 in the Executive Summary section of the PEIR. Refer to Section 3.3, Air Quality, (p. 3.3-81 through 3.3-84), which states, odor sources within the SCAG region, such as wastewater treatment facilities, landfills, and agricultural operations, are controlled by county and city odor ordinances and air district rules that prohibit nuisance odors and identify enforcement measures to reduce odor impacts to nearby receptors. These ordinances and rules are enforced by the air pollution control districts and local law enforcements. For example, SCAQMD, MDAQMD, and AVAQMD Rule 113; VPAPCD Rule 74.2; and ICAPCD Rules 101 and 424, *Architectural Coatings*, limit the amount of volatile organic compounds from architectural coatings and solvents to further reduce the potential for odiferous emissions. SCAQMD also provides rules to establish odor management practices and requirements from solid waste transfer stations, material recovery facilities, and rendering facilities in Rule 410, *Odors from Transfer Stations and Material Recovery Facilities*,<sup>34</sup> and Rule 415, *Odors from Rendering Facilities*.<sup>35</sup> Additionally, SCAQMD and MDAQMD's Rule 402;<sup>36, 37</sup> VCAPCD's Rule 51;<sup>38</sup> and IPAPCD's Rule 407<sup>39</sup> *Nuisance* establishes that no person shall discharge any source of air

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<sup>34</sup> South Coast Air Quality Management District. 2006. *Rule 410. Odors from Transfer Stations and Material Recovery Facilities*. Available online at: <https://ww3.arb.ca.gov/drdb/sc/curhtml/r410.pdf>, accessed October 30, 2019.

<sup>35</sup> South Coast Air Quality Management District. 2017. *Rule 415. Odors from Rendering Facilities*. Available online at: <https://ww3.arb.ca.gov/drdb/sc/curhtml/r415.pdf>, accessed October 30, 2019.

<sup>36</sup> South Coast Air Quality Management District. 1976. *Rule 402. Nuisance*. Available online at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf?sfvrsn=4>, accessed October 30, 2019.

<sup>37</sup> MDAQMD. 1977. *Rule 402 Nuisance*. Available online at: <http://mdaqmd.ca.gov/home/showdocument?id=290>, accessed November 15, 2019.

<sup>38</sup> VCAPCD. 2004. *Rule 51- Nuisance*. Available online at: <http://www.vcapcd.org/Rulebook/Reg4/RULE%2051.pdf>, accessed November 15, 2019.

<sup>39</sup> ICAPCD. 1999. *Rule 407 Nuisances*. Available online at: <https://ww3.arb.ca.gov/drdb/imp/curhtml/r407.pdf>, accessed November 15, 2019.

contaminants that may cause harm or nuisance to the public. In order to hold any facility accountable for nuisance rules, the air quality management districts allow the public to report any air quality problems within the district including odor complaints.<sup>40</sup> As such, the Plan would be required to adhere to these rules and implementation of the Plan would not be expected to result in substantial odor emissions or affect a substantial number of people when compared to existing conditions. Therefore, the impact would be less than significant, and the consideration of mitigation measures is not warranted.

**Response SUB 1-29 and SUB 1-31, SUB 1-32, SUB 1-35 through 1-37, 1-39 and 1-40, SUB 1-45 through SUB 1-49**

The commenter requests adding the language “where applicable and feasible” to the following mitigation measures: PMM BIO-1, PMM BIO-2, PMM BIO-3, PMM BIO-4, PMM BIO-5, PMM BIO-6, PMM CULT-1, PMM GEO-1, PMM CULT-2, PMM GEO-1, PMM GHG-1, PMM NOISE-2, PMM TRA-1, PMM TCR-1. See **Chapter 10.0, Corrections and Additions**, for the Executive Summary, pages 2.0-18 through 2.0-71.

**Response SUB 1-32**

The comment provides information that occasionally nationwide permits are revoked and Special Area Management Plans (SAMPs) are required and this should be reflected in Mitigation measure PMM BIO-4. See **Chapter 10.0, Corrections and Additions**, for the Executive Summary, for the requested change to page 3.4-85.

**Response SUB 1-34**

The commenter indicates that the PEIR (p 2.0-31) indicates that there are three Congestion Pricing strategies and that two were included in 2012 and 2016 RTP/SCS documents. Commenter asks which two and if measures previously implemented were effective or if new measures are required. See **Chapter 10.0, Corrections and Additions**, for Chapter 2.0 Project Description (p. 2.0-31). Additionally, of the three pricing strategies, the development of express lanes has been implemented. Mileage-based user fees and the development of cordon/area pricing have yet to be implemented but will likely occur in the future.

**Response SUB 1-38**

The comment requests an edit to Chapter 2.0 Project Description to add the term “toll roads.” See **Chapter 10.0, Corrections and Additions**, for page 2.0-35.

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<sup>40</sup> South Coast Air Quality Management District. 2019. *Odor Complaints and Nuisance Violations*. Available online at: <http://www.aqmd.gov/home/news-events/community-investigations/sunshine-canyon-landfill/odor-complaints>, accessed October 30, 2019.



**Response SUB 1-41 through SUB 1-44**

The commenter suggests the “less than significant” impact conclusions for Geology and Soils should be re-evaluated but does not raise a specific concern regarding the analysis in the PEIR. Commenter is referred to Section 3.7, Geology and Soils, which states, implementation of the Plan would not exacerbate existing geologic hazards including fault rupture because the SCAG region is a seismically active area, and this condition exists throughout the region. Furthermore, there are numerous regulations in place to reduce such risks to any planned development or transportation project. Regarding unstable soils, page 3.7-38 indicates that hazards associated with unstable soils or geologic units are dependent on site-specific conditions, as well as the specific nature of the individual project proposed. However, implementation of transportation projects and development projects anticipated to occur under the Plan would not be expected to exacerbate existing conditions with respect to geologic units and existing soils. With adherence to grading permit and building code requirements, including seismic design criteria as required by the CBC, transportation projects and anticipated development projects would be designed to minimize potential risks related to unstable soils and geologic units. No revisions are necessary.

**Response SUB 1-50**

The comment relates to the hierarchy of SCAG committees. This comment does not raise an environmental issue within the meaning of CEQA. See **Chapter 10.0, Corrections and Additions for Chapter 2.0, Project Description** (p 1.0-4).

**Response SUB 1-51**

The comment requests deleting a sentence regarding city and county general plans being required to be consistent. See **Chapter 10.0, Corrections and Additions**, for Section 3.11, Land Use and Planning (p 3.11-12).

**Response SUB 1-52**

The comment suggests additional text be added with respect to the RHNA (Section 3.11, Land Use Planning, (p 3.11-32)). SCAG objected to the HCD Regional Housing Need Determination in its letter dated September 18, 2019. The letter may be viewed at: <http://www.scag.ca.gov/programs/Documents/RHNA/SCAG-Objection-Letter-RHNA-Regional-Determination.pdf>. Additionally, the suggested edit goes beyond the scope of what is necessary to describe the RHNA process. Commenter is also referred to **Master Response No. 7: Regional Housing Needs Assessment**.

**Response SUB 1- 53**

The comment suggests a minor text edit to clarify housing need is determined by the RHNA process. See **Chapter 10.0, Corrections and Additions** for Section 3.11, Land Use and Planning (p 3.11-32).

**Response SUB 1-54 and SUB 1-55**

The comment asks questions regarding RHNA allocations and alternatives in the PEIR. With regards to allocation, allocation refers to the jurisdictional number by income category. A jurisdiction's RHNA allocation is derived by distributing the regional housing need to each of the 197 jurisdictions in the region using the RHNA allocation methodology adopted by the SCAG Regional Council on March 5, 2020. For further details of the adopted RHNA methodology, please see [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna). Additionally, a jurisdiction is required to site and zone for housing to meet its RHNA allocation. Commenter is also referred to **Master Response No. 7: Regional Housing Needs Assessment** and **Master Response No. 8 Alternatives**.

**Response SUB 1-56**

The comment requests clarifications regarding RHNA on page 3.11-33.

The comment takes issue with the statement that the RHNA does not necessarily encourage or promote growth (Section 3.14, Population and Housing, p 3.14-14, 4th paragraph).

The RHNA quantifies and allocates the determination of housing need during specified planning periods, at various income categories for each city and county in the region, in accordance with state housing law. Cities and counties then address this need through the process of updating, if necessary, the housing elements of local General Plans. This planning process is intended to accommodate the determined housing need, not necessarily encourage or promote growth. The RHNA objectives of "promoting infill development" and "the encouragement of efficient development patterns..." is to accommodate need in a sustainable manner.

The RHNA objectives of "promoting infill development" and "the encouragement of efficient development patterns..." is to accommodate growth in a sustainable manner. Commenter is referred to **Master Response No. 7 Regional Housing Needs Assessment**.

**Response SUB 1-57**

The comment provides a suggested edit on Section 3.11, Land Use and Planning (p 3.11-33), regarding the RHNA process. With regards to allocation, please refer to **SUB 1-52**. The suggested edit adds unnecessary detail to the sentence and therefore was not made. Commenter is referred to **Master Response No. 7: Regional Housing Needs Assessment**.

**Response SUB 1-58**

The comment provides a suggested edit on Section 3.14, Population and Housing (p 3.14-13), regarding the RHNA process. The suggested edit goes beyond the scope of what is necessary to describe the RHNA process. Commenter is referred to **SUB 1-52** and **Master Response No. 7: Regional Housing Needs Assessment**.

**Response SUB 1-59**

Regarding page Section 3.14, Population and Housing, (p 3.14-15 paragraph 2), the commenter asks if the existing needs portion of the 6<sup>th</sup> cycle RHNA will be consistent with Connect SoCal for the comparable period as stated in the referenced location. See **Master Response No. 7: Regional Housing Needs Assessment**.

**Response SUB 1-60**

The commenter indicates that the discussion of the RHNA on Section 3.14, Population and Housing (p 3.14-1 paragraph 1), is “extremely vague for an estimated 900,000 housing units of existing need”. The commenter is referred to **Master Response No. 7: Regional Housing Needs Assessment**.

**Response SUB 1-61**

The commenter expresses disagreement with HCD’s RHNA determinations and methodology. Commenter indicates that HCD ignores Government Code Section 65584.01(a). It is important to note that SCAG objected to the HCD Regional Housing Need Determination in its letter dated September 18, 2019. The objection letter could be viewed at:

<http://www.scag.ca.gov/programs/Documents/RHNA/SCAG-Objection-Letter-RHNA-Regional-Determination.pdf>.”

The commenter is referred to **Master Response No. 7: Regional Housing Needs Assessment**.

**Response SUB 1-62**

Commenter takes issue with the sentence (on page 3.11-33) that the RHNA does not necessarily encourage growth. See **Response 1-56**. See also **Master Response No. 7 Regional Housing Needs Assessment**.

**Response SUB 1-63**

The commenter expresses disagreement with HCD's RHNA determinations and methodology. It is important to note that SCAG objected to the HCD Regional Housing Need Determination in its letter dated September 18, 2019. The objection letter could be viewed at: <http://www.scag.ca.gov/programs/Documents/RHNA/SCAG-Objection-Letter-RHNA-Regional-Determination.pdf>. The commenter is referred to **Master Response No. 7: Regional Housing Needs Assessment**.

**Response SUB 1-64**

Regarding the existing needs portion of the RHNA, commenter references Section 3.11, Land Use and Planning (p 3.11-33), the commenter asks again (as in **Comment SUB-59**) if the existing needs portion of the 6<sup>th</sup> cycle RHNA will be consistent with Connect SoCal for the comparable period as stated in the referenced location. See **Master Response No. 7: Regional Housing Needs Assessment**.

**Response SUB 1-65**

The commenter requests the reference to the Orange County Central Coastal National Community Conservation Plan (NCCP) / Habitat Conservation Plan (HCP). This information is added to Section 3.4, Biological Resources (p 3.4-58); see **Chapter 10.0, Corrections and Additions**.

**Response SUB 1-66**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001465, 0001467-0001469, 0001475, 0001476, 0001479, 0001480, 0001482, 0001484-0001486, 0001488, 0001490, 0001491, 0001493-0001495, and 0001497* of the Final Connect SoCal Plan.

**Letter TRANS 1: Los Angeles County Metropolitan Authority**

Los Angeles County Metropolitan Authority  
Kalieh Honish  
Executive Officer, Long Range Planning  
Metro Countywide Planning & Development  
One Gateway Plaza  
Los Angeles, CA 90012

January 21, 2020

**Response TRANS 1-1**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001311, 0001312, 0001344, 0001347, 0001450, 0001454, and 0001559* of the Final Connect SoCal Plan.

**Response TRANS 1-2**

The comment suggests SCAG assist jurisdictions in SB 743 implementation. Mitigation Measure SMM TRA-3 on Section 3.17, Transportation, Traffic and Safety (p 3.17-62), of the PEIR outlines a SCAG initiated SB 743 implementation program. The grant-funded project, co-sponsored by SCAG and LADOT, seeks to provide technical and mitigation strategy development guidance to local jurisdictions in the six-county SCAG region to facilitate implementation of the VMT-based CEQA transportation impact analysis provisions of SB 743.

**Response TRANS 1-3**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001311, 0001312, 0001344, 0001347, 0001450, 0001454, and 0001559* of the Final Connect SoCal Plan.

**Letter TRANS 2: Orange County Transportation Authority**

Warren Whiteaker  
Orange County Transportation Authority

Undated

**Response TRANS 2-1**

The comment presents a technical change to replace “\$633.9 billion” with “638.6 billion.” Refer to **Chapter 10.0, Corrections and Additions**, for the Executive Summary page ES-4.

**Response TRANS 2-2**

The comment presents an editorial change. Refer to **Chapter 10.0 Corrections and Additions** for the Executive Summary.

**Response TRANS 2-3**

The comment presents a suggested edit, refer to **Chapter 10.0 Corrections and Additions** for Executive Summary and page 2.0-35.

**Response TRANS 2-4 through TRANS 2-14 and TRANS 2-16 through 2-18**

The comments suggest adding “where applicable and feasible” to mitigation measures PMM BIO-1, PMM BIO-2, PMM BIO-3, PMM BIO-4, PMM BIO-5, PMM BIO-6, PMM CULT-1, PMM CULT-2, PMM GEO-1, PMM GHG-1, PMM HYD-4, PMM NOISE-2, PMM TRA-1, PMM TCR-1. See **Response to Comment SUB 1-9**.

**Response TRANS 2-15**

The comment asks for clarification as to whether PMM HYD-4 (regarding raising roadbeds for new highways and rail facilities 1 foot above the 100-year base flood elevation) applies only to bridges. As for all mitigation measures, each lead agency would determine the necessity and applicability of this mitigation measure.

**Response TRANS 2-19**

The comment suggests reformatting Table 2.0-3. The purpose of the table is to provide general information regarding the expenditures, the reformatting is not necessary and does not raise an environmental concern within the meaning of CEQA. No revision was made.

**Response TRANS 2-20**

The comment requests updates to Figures 2.0-5, 2.0-8, 2.0-11 and 2.0-18. The referenced figures were updated as part of the Plan's final refinements. The refinements do not change the analysis within the PEIR which provides regional analysis. Commenter is referred to the Plan for the final figures.

**Letter TRANS 3: San Bernardino County Transportation Authority and San Bernardino Council of Governments**

San Bernardino County Transportation Authority  
San Bernardino Council of Governments  
1170 W. 3<sup>rd</sup> Street, 2<sup>nd</sup> Floor  
San Bernardino, CA 92410

January 27, 2020

**Response TRANS 3-1**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001308, 0001502, 0001509, 0001511 and 0001513* of the Final Connect SoCal Plan.

**Response TRANS 3-2**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001308, 0001502, 0001509, 0001511 and 0001513* of the Final Connect SoCal Plan.

**Response TRANS 3-3**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001308, 0001502, 0001509, 0001511 and 0001513* of the Final Connect SoCal Plan.

**Response TRANS 3-4**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001308, 0001502, 0001509, 0001511 and 0001513* of the Final Connect SoCal Plan.

**Response TRANS 3-5**

The comment requests clarification regarding VMT and GHG data presented within the RTP/SCS and the PEIR. Several factors that occurred during the development of the two documents may have resulted in data being presented slightly differently (due to the PEIR using earlier versions of model runs and rounding numbers differently). However, there is no difference between the VMT, GHGs or other performance measures associated with the Plan and the PEIR. As the documents are generally prepared in tandem due to the timeframe for publication, the data may be slightly different in each document. Since publication of the Draft EIR, the calculations and a number of tables have been revised. See **Chapter 8.0 Introduction** for a summary of the changes. Also, the PEIR sometimes presents data for different years, such as 2019 due to the CEQA requirement to use existing conditions. However, as stated, there is no difference between the VMT, GHGs and other performance measures.



**Response TRANS 3-6**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001308, 0001502, 0001509, 0001511 and 0001513* of the Final Connect SoCal Plan

**Response TRANS 3-7**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001308, 0001502, 0001509, 0001511 and 0001513* of the Final Connect SoCal Plan

**Response TRANS 3-8**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001308, 0001502, 0001509, 0001511 and 0001513* of the Final Connect SoCal Plan

**Response TRANS 3-9**

The comment relates to matching VMT data between the Plan and the PEIR. See Response TRANS 3-5. For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001308, 0001502, 0001509, 0001511 and 0001513* of the Final Connect SoCal Plan.

**Response TRANS 3-10**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001308, 0001502, 0001509, 0001511 and 0001513* of the Final Connect SoCal Plan.

**Response TRANS 3-11**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001308, 0001502, 0001509, 0001511 and 0001513* of the Final Connect SoCal Plan.

**Letter TRANS 4: Transportation Corridor Agencies**

Michael A. Kraman, Chief Executive Officer  
Transportation Corridor Agencies  
125 Pacifica, Suite 100  
Irvine, CA 92618

January 23, 2020

**Response TRANS 4-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001449* of the Final Connect SoCal Plan.

**Response TRANS 4-2**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001449* of the Final Connect SoCal Plan.

**Response TRANS 4-3 through TRANS 4-9**

The comments suggest clarifications to the PEIR regarding the existing and planned inter-operable priced transportation network. The Final PEIR updates all text changes to the Chapter 2.0 Project Description. Please refer to **Chapter 10.0, Corrections and Additions**, for numerous changes to Chapter 2.0 Project Description.

**Response TRANS 4-10**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001449* of the Final Connect SoCal Plan.

**Response TRANS 4-11**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001449* of the Final Connect SoCal Plan.

**Response TRANS 4-12**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001449* of the Final Connect SoCal Plan.

**Letter LOC 1: County of Los Angeles Department of Parks and Recreation**

Ju Lng Chien, Park Planner  
Planning and Development Agency  
1000 S. Fremont Avenue, Unit #40  
Alhambra, CA 91803

January 16, 2020

**Response LOC 1-1**

This comment is a set of general introductory remarks. No specific response is required.

**Response LOC 1-2**

The comment includes information regarding the Los Angeles Countywide Parks and Recreation Needs Assessment. This information is incorporated into the PEIR on Section 3.16, Parks and Recreation (p 3.16-18). See **Chapter 10.0, Corrections and Additions**, for that page.

**Response LOC 1-3**

The comment includes information regarding the Transit to Parks Strategic Plan (2019). This information is incorporated into the PEIR on Section 3.16, Parks and Recreation (p 3.16-18). See **Chapter 10.0 Corrections and Additions**, for that page.

**Response LOC 1-4**

The comment relates to parks to people ratios and the number of parks in the County on Section 3.16, Parks and Recreation (p 3.16-9), of the PEIR. The discussion is revised to reflect this comment. See **Chapter 10.0 Corrections and Additions**, for that page.

**Response LOC 1-5**

The comment provides a correction to the number of parks in the County as listed on Section 3.16, Parks and Recreation (p 3.16-10). See **Chapter 10.0 Corrections and Additions**, for that page.

**Response LOC 1-6**

The commenter provides contact information. No specific response is required.

**Letter LOC 2: County of Ventura, Resource Management Agency**

Linda Blackburn, Senior Planner  
Long Range Planning Section  
Ventura County Planning Division  
800 S. Victoria Avenue  
Ventura, CA. 93009

January 22, 2020

**Response LOC 2-1**

This comment provides introductory remarks. No specific response is required.

**Response LOC 2-2**

The comment states the Draft EIR did not include language which would address impacts on the County's Locally Important Species or communities, nor were they considered "special status species." The language in the PEIR included information to address potential impacts to "special status species." Specific language for Ventura County was included in the regulatory framework for local jurisdictions specifically that: "The Ventura County Code of Ordinances has established one ordinance related to biological resources. The Resources Element of the Ventura County General Plan has established one goal and two policies related to biological resources. The one code, one goal, and six supporting policies relevant to SCAG projects provide protection to native trees, sensitive species, sensitive habitats, wildlife corridors, and locally important species/communities."

Due to the scope and scale of the six county-wide SCAG region, analyses were limited to plants and animals listed in regional databases with georeferenced known locations (such as the California Natural Diversity Data Base, or CNDDDB). The impact analysis reviewed potential environmental impacts to sensitive biological resources from a regional perspective and is programmatic in nature. As such, Lead Agencies for each individual project will determine the level of environmental review required at the subsequent project-level evaluation of individual projects.

Project specific analysis and reporting will be required, and specific environmental documents are to be prepared that must consider local regulations, as outlined in project level mitigation measures, for example when a project will:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Existing conditions and impact analyses did include oak (*Quercus* spp.) and California (also known as black) walnut (*Juglans californica*) and various oak woodland and walnut plant communities, provided such information was available from regional databases. These species and communities were identified in Ventura County and impact analysis (from the broad scale of this PEIR) indicated that 0 acres of walnut communities, 44 acres of coast live oak, and 35 acres of valley oak communities were located within 500 feet of preliminarily identified “Major Transportation Projects”. As indicated in the PEIR, the regional records are incomplete and likely do not show all sensitive species and habitats present in a given area and project specific surveys should be required by the local Lead Agency for subsequent project-level evaluation of individual projects. See **Master Response No. 2: Program EIR vs Project EIR** and **Response to Comment ORG-8**.

#### **Response LOC 2-3**

The commenter refers to the County’s Initial Study Assessment Guidelines. As described in **Master Response No. 2: Program EIR vs. Project EIR**, the Connect SoCal PEIR is a programmatic document that provides a region-wide assessment of the potential significant environmental effects of implementing policies, strategies, projects, and programs included in Connect SoCal. Because the PEIR is programmatic in nature and regional in approach, it does not include site-specific analysis of any project contained in Connect SoCal, nor does it proscribe a specific approach that should be undertaken in any particular jurisdiction. Each jurisdiction is required to comply with CEQA and is encouraged to do so in a manner that is consistent with local guidelines. See also **Master Response No. 5: Approach to Mitigation Measures**, mitigation measures provide flexibility so that each jurisdiction can tailor their approach as appropriate.

#### **Response LOC 2-4**

The comment suggests SCAG should analyze the Plan with respect to Ventura County General Plan goals. See **Response REG 4-3** above. The SCAG jurisdiction is comprised of 191 cities and six counties all of which have numerous policies in their general plans. As described in the Plan, SCAG engaged with local, state and federal agency partners to develop the Plan. SCAG worked closely with local governments throughout the region to collect and compile data on land use and growth trends. This “Bottom-Up Local Input and Envisioning Process,” formed the basis for projections and strategies in

Connect SoCal. SCAG staff held one-on-one meetings with the region's 197 towns, cities and counties. In addition to seeking feedback on regional forecasts of population, household and employment growth, SCAG gathered data on land use, protected natural lands, farmland, flood areas and coastal inundation, regional bikeways, regional truck routes, planned major transit stops, high quality transit corridors, future transit priority areas, and other local data. In addition to the jurisdictions themselves, the data came from county assessors' offices, county transportation commissions, and state and federal partners. Although the Plan was developed through the collaborative process, determinations of consistency with individual jurisdictions policies are not required or appropriate at the program level. Moreover, SB 375 does not require consistency between the SCS and city or county general plan, community plan, specific plan, or local zoning ordinance.

The Plan does not identify specific development locations and even for transportation projects, detailed project information is not available. Impact BIO-3 starting on Section 3.4, Biological Resources (page 3.4-80), programmatically evaluates impacts of the Plan on wetlands. Mitigation measures are identified (starting on page 3.4-84), and impacts are found to be significant and unavoidable at the regional level (pages 3.4-85 to 3.4-86). See **Master Response No. 2: Program EIR vs. Project EIR**.

#### **Response LOC 2-5**

The comment provides specific edits to mitigation measures included in the PEIR. See **Chapter 10.0, Corrections and Additions**, for pages 3.4-72, 3.4-90, with respect to changes to the mitigation measures in response to this comment. While changes were made to the mitigation measures to modify the general language, inclusion of language specific to Ventura County requirements was not included. The reasoning for this is, as described in Chapter 1.0 Introduction, page 1.0-32, it is the intent of SCAG to allow project sponsors to use mitigation measures identified or comparable measures (as determined by the project sponsor/local jurisdiction). Project level mitigation measures contained within the PEIR are programmatic in nature, and therefore, references to any specific jurisdiction's requirements should be included by the jurisdiction at the project level. See also **Master Response No. 5: Approach to Mitigation Measures**.

#### **Response LOC 2-6**

This comment provides contact information. No specific response is required.

#### **Response LOC 2-7**

The comment provides land use policy analysis for Ventura County and indicates that Ventura County staff concurs with the PEIR's finding regarding land use consistency. No specific response is required.

**Response LOC 2-8**

The comment relates to solid waste tonnage provided in See **Chapter 10 Corrections and Additions** on page 3.19.1-1, Section 3.19, Solid Waste, Solid Waste, Table 3.19.1-1, Solid Waste Tonnage within the SCAG Region (2018). Please see **Chapter 10.0, Corrections and Additions**, for changes to the table.

**Response LOC 2-9**

The commenter concurs with PMM USWW-1. No specific response is required.

**Response LOC 2-10**

The comment relates to Ventura County's requirements related to specific projects requiring infrastructure improvements and the need to consult with Ventura County Planning Division. See **Master Response No. 2: Program EIR vs. Project EIR**.

**Response LOC 2-11**

This comment is a copy of the PEIR NOP comment letter and provides introductory text, and provides background information concerning local input and requests special consideration of farmland. Commenters input was considered as part of Plan and PEIR preparation. Loss of farmland is discussed in Impact AG-1 as well as AG-5, and mitigation is identified starting on page 3.2-22 as well as on page 3.2-30 on Section 3.2, Agriculture and Forestry. Impacts related to loss of farmland regionwide are found to be significant and unavoidable. See also **Master Response No. 2: Program EIR vs. Project EIR**.

**Response LOC 2-12**

The comment provides details regarding the Saticoy Area Plan and requests specific changes to the Project List/FTIP. See **Response LOC 2-7** above.

**Letter LOC 3: Ventura County Public Works**

Anthony Ciuffetelli, RMA Planner  
County of Ventura, Watershed Planning and Permits Division  
800 South Victoria Avenue  
Ventura, CA 93009

December 6, 2019

**Response LOC 3-1**

The comment summarizes the Connect SoCal project. No specific response is required.

**Response LOC 3-2**

The commenter provides information specific to project permitting in Ventura County relative to compliance with Ventura County Watershed District policies. Please refer to **Master Response No. 2: Program EIR vs. Project EIR**. Section 3.10, Hydrology and Water Quality, includes project-level mitigation measures, PMM HYD-1 and PMM HYD-2 and Section 3.4, Biological Resources, includes measures PMM BIO-1, PMM BIO-2 and PMM BIO-3 which all relate to wetlands and water quality. As stated throughout the PEIR, jurisdictions can and should implement project level mitigation included in the PEIR at the project level as appropriate and determined by each lead agency.

**Response LOC 3-3**

The commenter provides information specific to flood hazards and FEMA mapping in Ventura County. See **Response REG 6-2** above and **Master Response No.2: Program EIR vs. Project EIR**. Section 3.10, Hydrology and Water, includes measure PMM HYD -3 related to flooding.

**Response LOC 3-4**

The commenter indicates requirements for projects in the Coastal Zone relative to coastal hazards and sea level rise in Ventura County. See **Responses REG 6-1** and **REG 6-2** above and **Master Response No. 2: Program EIR vs. Project EIR**. Coastal Flooding and Sea level rise are discussed starting on page 3.10-22; Coastal Commission guidance is discussed starting on Section 3.10, Hydrology and Water Quality (p 3.10-38). Impacts associated with sea level rise are discussed starting on Section 3.10, Hydrology and Water Quality (p 3.10-66). A map showing areas vulnerable to sea level rise (including areas within Ventura County is presented in Figure 3.10-3, Areas Vulnerable to Sea Level Rise. Projects must be implemented in accordance with all local, state and federal requirements including any requirements specific to coastal zones.



**Letter LOC 4: City of Costa Mesa**

Barry Curtis  
Director of Economic and Development Services  
City of Costa Mesa  
P.O. Box 1200  
77 Fair Drive  
Costa Mesa, CA 92628

January 24, 2020

**Response LOC 4-1**

The letter expresses support for the recommendations submitted by OCCOG, OCTA and Center for Demographic Research. See Letters **SUB-1**, **TRANS-2** and **ORG-9** for specific responses.

**Letter LOC 5: City of Huntington Beach**

Nicole Aube, AICP  
Associate Planner  
City of Huntington Beach  
2000 Main Street  
Huntington Beach, CA 92648

January 23, 2020

**Response LOC 5-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001393* of the Final Connect SoCal Plan.

**Response LOC 5-2**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001393* of the Final Connect SoCal Plan

**Response LOC 5-3**

The comment relates to HQTAs. In response to this and similar comments, SCAG has revised the HQTAs within the Plan. Maps showing the revised locations of HQTAs are provided in the Plan. However, as discussed in Chapter 8.0 Introduction, the revisions to the HQTAs do not affect the regional level analysis provided in the PEIR. No revisions are necessary.

The comment relates to the Connect SoCal Project List. See **Master Response No. 1: General Comments and Non-CEQA Issues**. Projects featured in the Plan's Project List Appendix were provided by the six County Transportation Commissions (CTCs) for Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The projects provided by the CTCs are regarded as regionally significant and/or anticipated to receive (or already receiving) federal funds. In addition, the CTCs anticipate that these projects will be initiated or completed by the Plan's horizon year in this case, 2045. For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001393* of the Final Connect SoCal Plan.

**Response LOC 5-4**

The comment relates to the RHNA and the allocation of the 5<sup>th</sup> and 6<sup>th</sup> cycles. Refer to **Master Response No. 7: Regional Housing Needs Assessment**.

**Response LOC 5-5 through LOC 5-10**

The comment expresses support for comments from OCCOG and OCTA. Please refer to letters **SUB-1** and **TRANS-2** for responses.

**Response LOC 5-11**

This comment is a closing paragraph thanking SCAG for the opportunity to comment on the Plan and the PEIR. No specific response is required and no revisions are necessary.

**Letter LOC 6: City of Indio**

Gustavo Gomez Assistant Planner  
Community Development Department  
100 Civic Center Mall,  
Indio, CA 92201

January 24, 2020

**Response LOC 6-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001554* of the Final Connect SoCal Plan.

**Response LOC 6-2**

Commenter provides edits to Table 3.8-4, California Jurisdictions Addressing Climate Change in the SCAG Region. As requested, the table has been updated to reflect the City of Indio's Climate Action Plan. See **Chapter 10.0, Corrections and Additions**, for Section 3.8, Greenhouse Gas Emissions (p 3.8-58).

**Response LOC 6-3**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001554* of the Final Connect SoCal Plan.

**Response LOC 6-4**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001554* of the Final Connect SoCal Plan.

**Letter LOC 7: City of Irvine**

Pete Carmichael  
Director of Community Development  
City of Irvine  
Community Development  
1 Civic Center Plaza  
Irvine, CA 92606

January 24, 2020

**Response LOC 7-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001529* of the Final Connect SoCal Plan.

**Response LOC 7-2**

The comment expresses concurrence with comments from OCTA, OCCOG and Center for Demographic Research. Please refer to **Master Response No. 7: Regional Housing Needs Assessment**. Also, see Responses to **TRANS-2, SUB-1 and ORG-9**.

**Response LOC 7-3**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001529* of the Final Connect SoCal Plan.

**Response LOC 7-4**

The comment expresses opposition to any alternative that does not use local input and/or jurisdictional totals. See **Response SUB 1-6**.

**Response LOC 7-5**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001529* of the Final Connect SoCal Plan.

**Response LOC 7-6**

The comment expresses opposition to the naming of specific technology. See **Response SUB 1-7**.

**Response LOC 7-7**

The comment suggests language in the PEIR is leading and dramatic. The comment and its associated attachment include specific suggested text changes. These changes are incorporated where appropriate. See individual responses below. See **Response SUB 1-8**.

**Response LOC 7-8**

The comment relates to “can and should” language in the PEIR. See **Response SUB 1-9** and **Master Response 5: Approach to Mitigation Measures**.

**Response LOC 7-9**

The comment relates to the use of regulations in the mitigation measures. See **Response SUB 1-10** and **Master Response 5: Approach to Mitigation Measures**.

**Response LOC 7-10**

The comment suggests replacing the word “cities” with “jurisdiction.” See **Response SUB 1-11**

**Response LOC 7-11**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001529* of the Final Connect SoCal Plan.

**Response LOC 7-12**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001529* of the Final Connect SoCal Plan.

**Response LOC 7-13**

The comment relates to fees and/or taxes as mitigation measures. See **Response SUB 1-14**

**Response LOC 7-14**

Commenter provides a summary of comments and concluding remarks. See specific responses above. No additional response is required.

**Letter LOC 8: City of La Habra**

Carlos Jaramillo  
Deputy Director of Community Development  
Community Development  
110 E. La Habra Boulevard  
La Habra, CA 90633

December 19, 2019

**Response LOC 8-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001356* of the Final Connect SoCal Plan.

**Letter LOC 9: City of Laguna Hills**

David Chantarangsu  
Community Development Director  
City of Laguna Hills  
24035 El Toro Road  
Laguna Hills, CA 92653

January 24, 2020

**Response LOC 9-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001547* of the Final Connect SoCal Plan.



**Letter LOC 10: City of Lancaster**

Candice Vander Hyde

**Response LOC 10-1**

The comment relates to the Connect SoCal Project List. Please refer to **Master Response No. 1: General Comments and Non-CEQA Issues**. Projects featured in the Plan's Project List Appendix were provided by the six County Transportation Commissions (CTCs) for Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. Updates to the project list are coordinated through SCAG planning staff and are not comments on the PEIR. For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001375* of the Final Connect SoCal Plan.

**Letter LOC 11: City of Los Angeles, Department of Transportation (LADOT)**

Seleta J. Reynolds, General Manager  
Department of Transportation

January 16, 2020

**Response LOC 11-1**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001304 and 0001555* of the Final Connect SoCal Plan.

**Response LOC 11-2**

The comment generally summarizes the findings of Section 3.8, Greenhouse Gas Emissions, and suggests that SCAG continue to partner with state and local agencies to pursue solutions that reduce regional VMT. As described throughout the Plan and PEIR, SCAG uses a “bottom up” approach and committee involvement to shape the strategies within the Plan (See Chapter 2.0 Project Description). SCAG encourages LADOT to work closely with SCAG during the next four years to develop new and innovate strategies to reduce GHG emissions. The comment also expresses support for the mitigation measures included on Section 3.17, Transportation, Traffic and Safety (p 3.17-62 to 3.17-64), of the PEIR.

**Response LOC 11-3**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001304 and 0001555* of the Final Connect SoCal Plan.

**Response LOC 11-4**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001304 and 0001555* of the Final Connect SoCal Plan.

**Response LOC 11-5**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001304 and 0001555* of the Final Connect SoCal Plan.

**Response LOC 11-6**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001304 and 0001555* of the Final Connect SoCal Plan.

**Response LOC 11-7**

This comment is a set of summary remarks. No specific response is required.

**Letter LOC 12: City of Mission Viejo**

Dennis Wilberg, City Manager  
Office of the City Manager  
City of Mission Viejo  
200 Civic Center  
Mission Viejo, CA

January 22, 2020

**Response LOC 12-1**

This comment is a set of general introductory remarks. No specific response is required.

**Response LOC 12-2**

The comment requests quantification of GHG emission reductions per alternative for 2020 and 2035. The comment further states that SCAG internally shifts, within jurisdictions, future growth proximate to Priority Growth Areas resulting in a land use distribution that differs from the Local Input distribution. See **Master Response 8: Alternatives** and **Master Response 5: Regional Housing Needs Assessment**. Due to the various complexities of the model as well as the gross nature of estimates, SCAG has elected to discuss GHG emissions among alternatives qualitatively. *CEQA Guidelines* Section 15126.6(d) allows that alternatives be discussed at a lesser level of detail than the project.

**Response LOC 12-3**

The commenter requests clarification on the discussion of alternatives presented in the PEIR. Specifically, the statement that the Connect SoCal Plan and the Intensified Land Use Alternative would conflict with AB 32 and SB 32 despite meeting the targets. As discussed in Section 3.8, Greenhouse Gases, of the PEIR (p. 3.8-73), pursuant to Appendix G of the *CEQA Guidelines*, a significant GHG impact is identified if the Plan could conflict with applicable GHG reduction plans, policies, or regulations. Transportation projects and anticipated development under the Plan would be subject to complying with SB 375, SB 743, AB 32, and SB 32. SB 375 requires MPO's to meet per capita emission reduction by 2020 and 2035 as compared to the base year of 2005. AB 32 and SB 32 are statewide reduction goals aimed at reducing emissions to 1990 levels by 2020 and reducing emissions to 40% below 1990 levels by 2030, respectively. The Plan will meet the reduction goals set forth by CARB pursuant to SB 375 (19 percent by 2035). However, CARB has indicated that achievement of the SB 375 goals is insufficient for the transportation sector to meet the state's overall GHG reduction goals, achievement of the statewide goal would require a 25 percent per capita emissions reduction among all MPOs which CARB recognizes is infeasible. SCAG's 19 percent GHG emissions reduction goal results in a six percent gap. In addition, without additional information as to how other sectors (energy, water-related energy and other sources of emissions) would reduce

emissions to meet targets, the Plan would not be consistent with AB 32 and SB 32. As a result, the impact would be significant and unavoidable.

**Response LOC 12-4**

The comment relates to statements in the PEIR referencing the CARB progress report which stated that even if all MPOs meet regional SB 375 GHG targets, the state would not be able to meet the statewide GHG reduction goals of AB 32, SB 32, and the Scoping Plan (PEIR page 3.8-80). The commenter requests information on any policy, target or performance measures for the SCAG region related to GHG that may be imposed on local governments. SCAG's authority under SB 375 and other state and federal laws has not changed. CARB has not provided SCAG with specific VMT performance targets, and has only provided SCAG (and other MPOs) with GHG reduction targets under SB 375. Further SB 375 targets are regional targets and not local GHG reduction targets to be applied at the local level. It is however SCAG's role to work closely with local jurisdictions in the attainment of regional targets set by CARB. This process is fully described in the Connect SoCal plan as part of the "bottom up" planning process. Commenter is also referred to Response **LOC 12-3** above regarding statewide progress on achieving the targets set by CARB.

**Response LOC 12-5**

Comment suggests removing "can and should" language from the PEIR. Refer to **Response SUB 1-9** and **Master Response No. 5: Approach to Mitigation Measures**.

**Response LOC 12-6**

This comment is a set of general remarks. No specific response is required.

**Letter LOC 13:**            **City of Moreno Valley**

Claudia Manrique, Associate Planner

**Response LOC 13-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001542* of the Final Connect SoCal Plan.

**Letter LOC 14: City of South Pasadena**

Robert Joe, Mayor  
City of South Pasadena  
1414 Mission Street,  
South Pasadena, CA 91030

January 21, 2020

**Response LOC 14-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001534* of the Final Connect SoCal Plan.

**Letter LOC 15: City of West Hollywood**

John Leonard, Community and Legislative Affairs Manager  
City of West Hollywood  
8300 Santa Monica Blvd.  
West Hollywood, CA 90069

January 23, 2020

**Response LOC 15-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001416* of the Final Connect SoCal Plan.

**Letter LOC 16: City of Yorba Linda**

David Brantley, Community Development Director  
City of Yorba Linda  
4845 Casa Loma Avenue  
Yoba Linda, CA 92866

January 21, 2020

**Response LOC 16-1**

The comment provides introductory statements. No response is necessary.

**Response LOC 16-2**

The commenter states the RHNA growth and need is inconsistent with the Connect SoCal forecast. With regards to allocation, allocation refers to the jurisdictional number by income category. A jurisdiction's RHNA allocation is derived by distributing the regional housing need to each of the 197 jurisdictions in the region using the RHNA allocation methodology adopted by the SCAG Regional Council on March 5, 2020. For further details of the adopted RHNA methodology, please see [www.scag.ca.gov/rhna](http://www.scag.ca.gov/rhna).

The commenter is also referred to **Response Sub 1-54** and **Sub 1-55** and **Master Response No. 7: Regional Housing Needs Assessment**.

**Response LOC 16-3**

The comment requests an edit to Section 3.14, Population and Housing, specifically related to the guiding principles. This change is made. Refer to **Section 10.0, Corrections and Additions**, for page 3.14-9.

**Response LOC 16-4**

The comment takes issue with the statement that the RHNA does not necessarily encourage or promote growth (Section 3.14 Population and Housing (p 3.14-14, 4<sup>th</sup> paragraph). Commenter is referred to **Response SUB 1-56**.

**Response LOC 16-5**

The comment relates to the 6<sup>th</sup> cycle of the RHNA and whether it will be consistent with the Connect SoCal for the comparable period. Refer to **Master Response No. 7: Regional Housing Needs Assessment**.

**Response LOC 16-6**

The comment relates to the 6<sup>th</sup> cycle of the RHNA. Refer to **Master Response No. 7: Regional Housing Needs Assessment**.



**Response LOC 16-7**

The comment suggests the RHNA methodology is a reasonable alternative. SCAG disagrees that the RHNA methodology is a CEQA alternative. The RHNA is a planning process and cannot be used as a reasonable growth forecast. Once the allocation has gone through the local planning process of being included in local housing elements, those numbers become part of the local input process SCAG uses for developing the growth forecast which ultimately is used in the SCS. Refer also to **Master Response No. 7: Regional Housing Needs Assessment.**

**Response LOC 16-8**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001557* of the Final Connect SoCal Plan.

**Response LOC 16-9**

The comment is a summary of the letter. Comments are responded to individually above.

**Letter ORG 1: Coalition for a Safe Environment**

California Kids IAQ  
Community Dreams  
EMERGE  
American Legion Post #6  
Wilmington Improvement Network  
San Pedro & Peninsula Homeowners Coalition  
NAACP - San Pedro-Wilmington Branch #1069  
St. Philomena Social Justice Ministry

January 24, 2020

**Response ORG 1-1**

The comment requests a 30-day extension for the public comment period. SCAG provided notice to interested parties in accordance with *CEQA Guidelines* Section 15085. As such, an extension is not necessary or warranted. The Connect SoCal Plan process including the PEIR process is tightly scheduled and an extension of the PEIR review period could result in unnecessary delay.

**Response ORG 1-2**

The comment suggests the PEIR include a section on environmental justice and disadvantaged communities. Connect SoCal includes an Environmental Justice (EJ) Technical Report. As identified in the EJ Technical Report, SCAG identified 18 performance indicators and conducted analyses of existing and future social and environmental equity in the region in various areas of analysis, which are environmental justice areas, Senate Bill 535 (SB 535) disadvantaged communities, and communities of concern. The EJ Technical Report concludes that Connect SoCal implementation will not result in disproportionate or adverse impacts on low income and minority populations in most performance areas. Specifically, conditions will improve regionally for EJ communities in accessibility to employment and services and parks and educational facilities, impacts along freeways and high-traffic roads, and travel time and travel distance savings. Current conditions analyses for active transportation hazards, climate vulnerability and public health indicate that EJ communities incur a higher risk of adverse impacts while current condition analyses on jobs-housing imbalance and neighborhood change and displacement indicate EJ communities will experience improvements or not be impacted. The regional and local emissions impact, roadway noise impacts and rail-related impact analyses show adverse impacts at the local level for certain regions but improvements at a regional level. The EJ Technical Report also finds the Plan has yielded positive results in travel time and travel distance reductions for the region and EJ communities, specifically in less spending time on driving and more on transit; as such, more people will be using public transportation to reach their essential destinations (e.g. job, shopping, recreation, etc.) as the result of more integrated transit system

An EJ Toolbox is also provided which includes recommended practices and approaches for performance areas that may result in disproportionate adverse impacts on EJ communities and can be a resource to local jurisdictions or EJ stakeholders to combat disproportionately adverse impacts on EJ communities. The EJ Toolbox has been added to the following measures PMM AQ-1 aa), PMM GHG-1, and PMM NOISE-1. See **Chapter 10.0, Corrections and Additions**, for page 3.3-67, 3.8-72, and page 3.13-39. CEQA requires that where General Plans have been updated to include policies relevant to EJ, that the CEQA analysis should address consistency with those policies. This is a recent requirement and few if any general plans have been updated to address EJ. Therefore, it was not possible to undertake an evaluation of Plan consistency with such policies as of yet. In general, there is no requirement to include a separate EJ analysis within CEQA documents as CEQA is focused on physical impacts on the environment. However, EJ issues may be a factor in considering individual projects. The commenter is referred to the EJ Technical Report for evaluation of EJ impacts on communities in the SCAG region.

**Response ORG 1-3**

The comment refers to redline mark-up of the PEIR provided by the commenter. These comments are responded to individually below.

**Response ORG 1-4**

The comment suggests edits to the introductory paragraph. Refer to **Chapter 10.0, Corrections and Additions**, for Section 3.3, Air Quality (p 3.3-1).

**Response ORG 1-5**

The comments are editorial opinions – no changes were made.

**Response ORG 1-6**

The comment requests EJ information on cancer risk. The commenter is referred to the EJ Report which includes public health indicators. Specifically, Table 33 Criterion Exposure by Geography Relative to all Census Tracts in the State. The table shows the performance of the greater SCAG region for the selected criteria. SCAG performs relatively better for the instances of PM2.5 Concentrations in the air than all other variables. This could be due to the fact that the SCAG region is very large, and 98 percent of the region's population live in Urban Areas, which represent only 13 percent of the region's overall land area. Further, commenter is referred to Appendix 3.3, Health Risk Assessment included in the PEIR which evaluates risk associated with the Plan.

**Response ORG 1-7**

The comment states the PEIR is in non-compliance with AB 32 because SCAG does not require transportation projects to comply. Regarding AB 32, the commenter is referred to Section 3.8, Greenhouse Gases. As stated on Section 3.8, Greenhouse Gases (p 3.8-39), in December 2017, CARB adopted California's 2017 Climate Change Scoping Plan (2017 Scoping Plan Update), which outlines the proposed framework of action for achieving California's SB 32 2030 GHG target: a 40 percent reduction in GHG emissions by 2030 relative to 1990 levels. The 2030 target is intended to ensure that California remains on track to achieve the goal set forth by Executive Order B-30-15 to reduce statewide GHG emissions by 2050 to 80 percent below 1990 levels.

As stated on Section 3.8, Greenhouse Gases (p 3.8-39) of the PEIR, "[T]he 2017 Scoping Plan Update identifies key sectors of the implementation strategy, which includes improvements in low carbon energy, industry, transportation sustainability, natural and working lands, waste management, and water. Through a combination of data synthesis and modeling, CARB determined that the target statewide 2030 emissions limit is 260 MMTCO<sub>2e</sub>, and that further commitments will need to be made to achieve an additional reduction of 50 MMTCO<sub>2e</sub> beyond current policies and programs. Key elements of the 2017 Update include a proposed 20 percent reduction in GHG emissions from refineries and an expansion of the Cap-and-Trade program to meet the aggressive 2030 GHG emissions goal and ensure achievement of the 2050 limit set forth by E.O. B-30-15."

For the transportations sector, the 2017 Update indicates that while most of the GHG reductions will come from technologies and low carbon fuels, a reduction in the growth of vehicle miles traveled (VMT) is also needed. The 2017 Update indicates that stronger SB 375 GHG reduction targets will enable the State to make significant progress toward this goal, but alone will not provide all of the VMT growth reductions that will be needed. It notes that there is a gap between what SB 375 can provide and what is needed to meet the State's 2030 and 2050 goals. The 2017 Update recommends that local governments consider policies to reduce VMT, including: land use and community design that reduces VMT; transit-oriented development; street design policies that prioritize transit, biking, and walking; and increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities.

As discussed in Section 3.17, Transportation, Traffic and Safety, CARB and OPR have recommended project-level VMT thresholds of significance in their guidance documents for use in evaluating traffic impacts in CEQA documents. These thresholds are intended to meet statewide GHG emissions targets through VMT reductions from the transportation sector. Both CARB and OPR acknowledge that MPO's are tasked with meeting SB 375 GHG emissions targets, and while CARB has determined that meeting

these targets will not be sufficient to attain state climate goals, more can be done at the project level. At the project level, lead agencies may consider CARB, OPR and other recommended thresholds of significance and determine which ones are appropriate and feasible for an individual project. The discussion of GHG impacts below considers the potential for the region as a whole to meet the CARB and OPR targets.

Further, SCAG does not have approval authority over any of the projects in the Plan. Rather, the projects are selected by the local jurisdictions including cities, counties and county transportation commissions. See **Master Response No. 1: General Comments and Non-CEQA Issues**, **Master Response No. 2 Program EIR vs. Project EIR**, and **Master Response No. 5: Approach to Mitigation Measures**.

#### **Response ORG 1-8**

The comment refers to the contents and requirements of AB 617 and asserts that SCAG is in non-compliance with AB 617 because it rubber-stamps and approves all projects and does not require transportation and infrastructure projects to comply with AB 617. AB 617 requires CARB, in consultation with air districts, to select communities for community air monitoring and/or the preparation of community emission reduction programs. AB 617 specifies that the highest priority areas shall be disadvantaged communities with high cumulative exposure burden for criteria pollutants and toxic air contaminants. In response to AB 617, CARB has established the Community Air Projection Program to reduce exposure in communities most impacted by air pollution. While SCAG is monitoring this program, it is not directly involved in implementation of AB 617. Also, SCAG has no specific authority to approve or disapprove transportation projects within the Plan. See **Master Response No. 1 General Comments and Non-CEQA Issues**, **Master Response No. 2: Program EIR vs. Project EIR**, and **Master Response No. 5: Approach to Mitigation Measures**.

#### **Response ORG 1-9**

The comment states SCAG approves all projects. On the contrary, SCAG has no specific authority to approve or disapprove transportation projects within the Plan. The comment identifies summaries of SB 44 (comprehensive plan for reducing GHGs from medium and heavy-duty vehicles), SB 210 (develop a heavy-duty inspection and maintenance program for non-gasoline heavy duty truck) and provides summary information regarding SB 375 (regarding SCS requirements that are discussed on page 3.8 -31 in the Regulatory Framework section of the analysis of Greenhouse Gasses). The additional information provided by the commenter further illustrates how the State of California regulates emissions. The PEIR does not identify each and every regulation that would reduce emissions in the state but rather summarizes key regulations applicable to the analysis. Refer to **Master Response No. 1: General**

**Comments and Non-CEQA Issues, Master Response No. 2: Program EIR vs. Project EIR, and Master Response No. 5: Approach to Mitigation Measures.****Response ORG 1-10**

The commenter states that SCAG is in non-compliance with Our County – Los Angeles County Sustainability Plan. While there is no specific mandate for the Plan to be consistent with any local plan, SCAG undertook a comprehensive “bottom up” planning approach to ensure overall compatibility with local and regional plans such as the Our County plan (see Chapter 2.0 Project Description). The commenter is referred to Section 3.11, Land Use and Planning (p 3.11-45), which states, “[w]hile the Plan was developed primarily from assumptions derived from local general plans and input from local governments and transportation agencies, SB 375 does not require local land use policies, regulations or general plans to be consistent with the Plan. Also, although the transportation projects and land use strategies included in the Plan are generally compatible with county- and regional-level general plans, local general plans may not have been updated since SCAG’s last adopted 2016 RTP/SCS. As such, it is likely that there could be incompatibilities with existing general plans in the region.

SCAG has no authority to adopt, approve, implement, or otherwise regulate local land use plans or individual projects that are listed in the Connect SoCal Plan. SB 375 specifically provides that a regional transportation plan does not supersede the land use authority of cities and counties. In addition, cities and counties are not required to change their land use plans and policies, including general plans, to be consistent with the Plan. Rather, SB 375 requires the projections of a regional land use pattern integrated with the transportation network and the provision of strategies and recommended policies to reduce per capita GHG emissions from automobiles and light trucks. Local governments reserve their land use authority and may incorporate, as appropriate, the recommended land use strategies, guiding principles, and policies include in the Plan.”

**Response ORG 1-11**

The comment suggests roles for SCAG in implementing mitigation measures. SCAG does review and submit comments on regionally significant projects through its Intergovernmental Review (IGR) process. As part of this process, projects are reviewed for overall compatibility with Plan policies. SCAG also recommends mitigation measures through this PEIR process. These measures are for both SCAG and local jurisdictions. SCAG’s seeks to work cooperatively and collaboratively with its member agencies. SCAG decisions are made by the SCAG Regional Council which is comprised of representatives of member agencies. Commenter is also referred to **Master Response No. 5: Approach to Mitigation Measures.**

**Response ORG 1-12**

The comment relates to the role of SCAG. SCAG does not have approval authority over individual projects included in the Plan. Each project undergoes environmental review at the local or state level, depending on the lead agency. SCAG is not the lead agency for any project within the Plan and therefore does not approve environmental documents for projects. Many of the projects included in the Plan have not yet undergone environmental review as they are still in the planning phase. They are programmed within the Plan to allow for federal and/or local funding but there is not sufficient information at that stage to evaluate potential environmental impacts. Further, the Connect SoCal PEIR is a program level document that consists of regional analysis. It does not evaluate any one project in particular detail. It would be speculative to attempt to assess environmental impacts of those projects that have not yet undergone environmental review. See **Master Response No. 2: Program EIR vs. Project EIR**. The PEIR identifies significant impacts to air quality because of anticipated regional increases in certain criteria pollutant emissions and SCAG's lack of authority to impose project-level mitigation measures, and therefore the inability of SCAG to determine if impacts of individual projects would be mitigated to a less than significant level.

**Response ORG 1-13**

Commenter suggests mitigation measures related to zero emissions. The suggested mitigation measures have not been included for the following reasons, SCAG does not currently have expertise, staffing or funding to create a zero-emissions technology clearinghouse. SCAG, however, does encourage the commenter to participate in SCAG's Emerging Technology Committee which does seek ways to encourage new technologies such as zero emissions technology. Commenter also suggests a mitigation measure for SCAG to request health impact assessments to develop a public health baseline for the region. This measure would not mitigate any particular impact identified within the PEIR and is not within SCAG's purview. However, the comment will be forwarded to the decision maker for their consideration in taking action on the Plan.

**Response ORG 1-14**

The comment implies SCAG knows the future construction activity of projects in the region. While SCAG maintains a project list, the details of many of the projects are unknown as the projects are still in the planning phase. As such, the specific size and location of future construction activity within the SCAG region is uncertain. See **Master Response No. 2: Program EIR vs. Project EIR**.

**Response ORG 1-15**

The comment provides a reference for recent reports. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be forwarded to the decision maker for their consideration in taking action on the Plan. See **Master Response No. 1: General Comments and Non-CEQA Issues**.

**Response ORG 1-16**

The comment suggests the PEIR should include a reference to CARB's Air Quality and Land Use Handbook. Commenter is referred to Section 3.3, Air Quality (p 3.3-42), of the PEIR which includes a summary of this report.

**Response ORG 1-17**

The comment suggests the PEIR should include a reference to SCAQMD Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. While this document is referenced in several locations in the PEIR Section 3.3 Air Quality, has been updated in **Chapter 10.0, Corrections and Additions** (see changes for page 3.11-38), to provide a full citation to the report.

**Response ORG 1-18**

The comment requests the above references be added to the PEIR. See **Responses ORG 1-15 through ORG 1-17** above.

**Response ORG -19**

The commenter suggests the PEIR define the terms "clean up green up" and "buffer zone" in the Land Use section, however, these terms are not used within the land use section. Therefore, no change was made.

**Response ORG 1-20**

The commenter suggests several terms to be defined in the land use section of the PEIR. Environmental Justice area is defined in the RTP Glossary, disadvantaged communities are defined on page 2 of the Environmental Justice Technical Report. The definition of cumulative impacts is provided in Section 3.21 Cumulative Impacts of the PEIR.



**Letter ORG 2: Diamond Bar – Pomona Valley Sierra Club Task Force, Angeles Chapter**

Cynthia Robin Smith  
Diamond Bar – Pomona Valley Sierra Club Task Force, Angeles Chapter  
324 S. Diamond Bar Blvd, #230  
Diamond Bar, CA 91765

January 24, 2020

**Response ORG 2-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001543* of the Final Connect SoCal Plan.

**Response ORG 2-2**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001543* of the Final Connect SoCal Plan.

**Response ORG 2-3**

The comment provides information on sensitive species specific to the Diamond Bar area and requests the included information be added to the PEIR and Plan. Due to the scope and scale of the six county-wide SCAG region, analyses were limited to plants, animals, and habitats listed in regional databases with georeferenced known locations (such as the California Natural Diversity Data Base, or CNDDDB). The impact analysis reviewed potential environmental impacts to sensitive biological resources from a regional perspective and is programmatic in nature. As such, Lead Agencies for each individual project will determine the level of environmental review required for subsequent project-level evaluation of individual projects.

Section 3.4, Biological Resources, Figure 3.4-2, Sensitive Wildlife Species Reported in the SCAG Region, does capture and show CNDDDB records of gnatcatchers within the northern portion of the City of Diamond Bar Natural Open Space Area (record from 2017), but as this is a regional analysis these are difficult to see at this scale. As indicated in the PEIR, the regional records are incomplete and likely do not show all sensitive species or habitats present in a given area and project specific surveys should be required by the Lead Agency for subsequent project-level evaluation of individual projects. The updated City of Diamond Bar biological information should be included in these future studies. See **Master Response No. 2: Program EIR vs. Project EIR**.

**Response ORG 2-4**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001543* of the Final Connect SoCal Plan.

**Letter ORG 3: Sierra Club, Moreno Valley**

George Hague  
Sierra Club  
Moreno Valley Group  
P.O. Box 1328  
Moreno Valley, CA 92556

January 24, 2020

**Response ORG 3-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001538* of the Final Connect SoCal Plan.

**Letter ORG 4: The Two Hundred**

John Gamboa  
Vice-Chair  
The Two Hundred  
1918 University Avenue, Suite 3C  
Berkeley, CA 94704

No Date

**Response ORG 4-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001443* of the Final Connect SoCal Plan.

**Response ORG 4-2**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001443* of the Final Connect SoCal Plan.

**Response ORG 4-3**

The comment is a set of general objections to the PEIR. Individual comments are responded to below. For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001443* of the Final Connect SoCal Plan.

**Response ORG 4-4**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001443* of the Final Connect SoCal Plan.

**Response ORG 4-5**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001443* of the Final Connect SoCal Plan.

**Response ORG 4-6**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001443* of the Final Connect SoCal Plan.

**Response ORG 4-7**

The comment presents a set of general objections to the Connect SoCal land use plan and states the PEIR should evaluate the environmental consequences of an “economically infeasible” Plan. SCAG’s land use plan was developed in partnership with demographers, local jurisdictions, and housing experts and represents several years of collaboration and research. While it may be true that current housing prices in

many parts of Southern California are beyond the reach of moderate and low wage workers, it is wholly speculative to suggest that these conditions and other theoretical conditions such as “an explosion of ‘supercommuters’” are attributable to the Plan. An economic impact analysis is not appropriate under CEQA unless physical changes to the environment attributable to the project could occur as a result. Section 21082.2(c) of the Public Resources Code states that lead agencies need not consider: “evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment.” As such, the PEIR does not speculate as to economic conditions, but rather it evaluates the reasonably foreseeable environmental consequences based on reasonable assumptions. The commenter is referred to Section 3.14, Population and Housing, which discusses the issues such as displacement and gentrification and the fact that there is no reasonable method to identify how many people could be displaced and where they could move to and therefore no feasible way to identify any potential impacts on transportation, air and noise as a result of these changes (pages 3.14-27 to 3.14-28).

#### **Response ORG 4-8**

The comment is a set of general objections to the Plan’s strategies and CARB’s GHG reduction targets. The Connect SoCal Plan and PEIR does not establish regional or project-level VMT reduction targets. SCAG along with other MPOs in the state are required, pursuant to SB 375, to develop a SCS to meet established GHG reduction targets by using a combination of VMT reducing strategies. As recognized by CARB, MPOs do not have land use authority to implement additional VMT reductions. As such, CARB has issued project-level VMT reduction targets to further reduce GHG emissions. While the commenter may disagree with CARB and its project-level VMT targets, and the use of VMT reduction strategies in the Plan, SCAG nonetheless is required to develop an SCS and address GHG reduction targets through reductions in per capita VMT. Refer to **Master Response No. 6: Vehicle Miles Traveled (VMT Analysis)**.

#### **Response ORG 4-9**

The comment references a lawsuit filed against CARB and suggests adverse physical impacts would occur as a result of higher housing costs. SCAG disagrees with the commenters premise that the construction of infill housing would necessarily result in higher housing prices overall and additional physical impacts. This PEIR analyzes the potential physical impacts of the anticipated build out of the Plan through 2045 and analyzes a variety of housing types, urban, suburban, rural, townhome, apartment accessory dwelling unit. All types of housing, including affordable and market rate housing, are captured within the analysis in this document. The impacts of housing, growth, and transportation are all linked together over the course of the Plan. While there could be some variation in better/worse impacts depending on the land use pattern ultimately adopted by the region (as demonstrated in the alternatives analysis), in general impacts of housing (all housing) are captured within this PEIR. The PEIR appropriately analyzes the environmental effects of what is reasonably foreseeable to occur as a result of

the Plan. The Plan was developed by numerous experts in housing and demographics who identify expected Plan outcomes based on professional expertise. For additional information regarding housing affordability, please refer to the Sustainable Communities Strategy Technical Report of the Final Connect SoCal Plan.

**Response ORG 4-10**

The comment relates to the RHNA process and the PEIR cumulative analysis. Again, SCAG disagrees with the commenter that the existing need is cumulative to the Plan. Refer to **Master Response 7: Regional Housing Needs Assessment**.

**Response ORG 4-11**

The comment relates to mitigation measures. SCAG has identified both SCAG mitigation measures and mitigation measures for project sponsors. Commenter is referred to **Master Response 5: Approach to Mitigation Measures** and to the Executive Summary of the PEIR which includes a listing of SCAG and project level mitigation measures.

**Response ORG 4-12**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001443* of the Final Connect SoCal Plan. For additional information regarding affordable housing, please refer to the revised Sustainable Communities Strategy report of the Final Connect SoCal Plan.

**Response ORG 4-13**

The comment presents a summary of the commenter's above comments regarding the PEIR. These comments are responded to individually above.

**Response ORG 4-14**

The comment presents a set of general objections to CARB and SCAG. These comments are responded to individually above.

**Response ORG 4-15**

The commenter suggests SCAG advocate for a one-year extension for its conformity determination and PEIR to pursue legal action. SCAG has undertaken the Plan and the RHNA processes with opportunities for full participation of its member agencies and stakeholders, and the approval and guidance of state and federal agencies as applicable.). At this time, SCAG does not see a reason to delay approval of Connect SoCal and the PEIR at the risk of a conformity lapse. SCAG's current conformity finding on its 2016 RTP/SCS expires in June 2020. Pursuant to the federal Clean Air Act and the federal Transportation Conformity Regulations, the Connect SoCal is required to receive federal approval of its final

transportation conformity determination by June 1, 2020. In addition, there is no statutory nor regulatory provisions for any extension of transportation conformity determination. Finally, contrary to the commenter's assertion, SANDAG did not receive a one-year extension for its conformity determination.

With regards to the PEIR, the PEIR was available beginning December 9, 2019 through January 24, 2020, for a total of 46 days. *CEQA Guidelines* Section 15105 states, "[t]he public review period for a draft EIR shall not be less than 30 days nor should it be longer than 60 days except in unusual circumstances.

As demonstrated in the responses herein, SCAG has prepared a lawful and effective Plan and associated PEIR; there is no reason for a one-year extension or legal action.

**Response ORG 4-16**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001443* of the Final Connect SoCal Plan.

**Letter ORG 5: Westwood South of Santa Monica Blvd Homeowner's Association**

Barbara Broide, President  
Westwood South of Santa Monica Blvd Homeowner's Association  
P.O. Box 64213  
Los Angeles, CA 90064

January 24, 2020

**Response ORG 5-1**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001439 and 0001440* of the Final Connect SoCal Plan.

**Letter ORG 6: ARSAC Alliance for a Regional Solution to Airport Congestion**

Denny Schneider, President  
Robert Acherman, Vice President  
ARSAC Alliance for a Regional Solution to Airport Congestion  
7929 Breen Ave  
Los Angeles, CA 90045

January 24, 2020

**Response ORG 6-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001438* of the Final Connect SoCal Plan.

**Response ORG 6-2**

The comment relates to the public comment period for the PEIR. The PEIR was available beginning December 9, 2019 through January 24, 2020, for a total of 46 days. *CEQA Guidelines* Section 15105 states, “[t]he public review period for a draft EIR shall not be less than 30 days nor should it be longer than 60 days except in unusual circumstances. When a Draft EIR is submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 45 days, unless a shorter period, not less than 30 days, is approved by the State Clearinghouse.” No unusual circumstances have occurred which would justify extending the comment period.

**Response ORG 6-3**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001438* of the Final Connect SoCal Plan.

**Response ORG 6-4**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001438* of the Final Connect SoCal Plan. The comment suggests LAX is the fourth busiest airport rather than the fifth. See 10.0 Corrections and Additions for page 1.0-4.

**Response ORG 6-5**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001438*. The comment suggests noise contours for reliever airports should be included in Appendix 3.13. Reliever airports represent a minor percentage of regional aviation noise, and therefore were not evaluated. The comment also asks if emissions for these airports are accounted for in the GHG and air quality sections. Emissions associated with these airports are captured within the AQMP and other regional scale air quality documents which are complementary to the Plan. Please refer to the revised Aviation Technical Report of the Final Connect SoCal Plan.



**Response ORG 6-6**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001438* of the Final Connect SoCal Plan.

**Response ORG 6-7**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001438* of the Final Connect SoCal Plan.

**Letter ORG 7: Los Angeles County Business Federation**

Sandy Sanchez  
David Fleming  
Tracy Hernandez  
Los Angeles County Business Federation (BizFed)  
6055 E. Washington, Blvd. #1005  
Commerce, CA 90040

January 24, 2020

**Response ORG 7-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001524* of the Final Connect SoCal Plan.

**Letter ORG 8: Center for Biological Diversity**

Tiffany Yap, D. Env/Ph.D  
Scientist, Wildlife Corridor Advocate  
1212 Broadway, Suite #800  
Oakland, CA 94612

January 24, 2020

**Response ORG 8-1**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001444 and 0001445* of the Final Connect SoCal Plan.

**Response ORG 8-2**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001444 and 0001445* of the Final Connect SoCal Plan.

**Response ORG 8-3**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001444 and 0001445* of the Final Connect SoCal Plan.

**Response ORG 8-4**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001444 and 0001445* of the Final Connect SoCal Plan.

**Response ORG 8-5**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001444 and 0001445* of the Final Connect SoCal Plan.

**Response ORG 8-6**

The Draft Program Environmental Impact Report (PEIR) found that implementation of the Plan would have significant and unavoidable impacts to species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service (Impact BIO-1, Section 3.3, Biological Resources). At the time of the preparation of the PEIR, mountain lions were not candidate or listed species by the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service. Discussions for listing this species are currently underway with CDFW. However, as stated above, at time of the preparation of this PEIR, mountain lions are not listed.

In addition, due to the scope and scale of the analysis of the six county-wide SCAG region, analyses were limited to plants, animals, habitats, and other natural resource information listed in regional databases with georeferenced known locations (such as the California Natural Diversity Data Base, or CNDDB). Data for mountain lions are not currently tracked in these databases. The impact analysis reviewed potential environmental impacts to sensitive biological resources from a regional perspective and is programmatic in nature. As such, Lead Agencies for each individual project will determine the level of environmental review required for subsequent project-level evaluation of individual projects. Should mountain lions be listed or a candidate species in the future, or if otherwise required by the Lead Agency, it will need a full analysis in project-specific environmental documents.

The PEIR also found that the Plan would interfere substantially with the movement of any native resident or migratory fish or wildlife species, such as mountain lion, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites and would result in a significant and unavoidable impact (Impact BIO-4, Section 3.3, Biological Resources). Numerous project level mitigation measures were identified for migratory species (including mountain lions). These measures included consulting with “wildlife corridor authorities”; counties, cities, and other local organizations; USFS, CDFW, and USFWS and other agencies for projects that could impact wildlife corridors or migration for project planning. The PEIR also included project-specific mitigation measures to: design proposed projects to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors; conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site; analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor; require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation; pursue mitigation banking to preserve habitat linkages and corridors; design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches; evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat; to provide wildlife crossings in accordance with proven standards; and, where avoidance is not feasible, to design sufficient conservation measures through coordination with local agencies and the regulatory agencies (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites.

The potential for climate change to heighten impacts to natural resources, endangered, threatened, or sensitive species and wildlife movement was discussed in several parts of the biology sections and impact analysis for natural resources. Future specific projects should at a minimum include consideration for

rising sea levels, increased temperatures, decreased water availability and/or altered precipitation patterns, and invasive species infestations. As described in the PEIR, special status species are most susceptible to climate change due to their small population sizes and, often, specific suitable habitat conditions required for their survival. The combination of project impacts and climate change can further reduce available habitat, reduce movement opportunities for wildlife, provide new corridors for invasive species infestations, and increase the risk of fires in open space to the detriment of special status species. Several project-level mitigation measures are recommended to help address some impacts of climate change including habitat restoration, invasive species control plans, wildlife corridor redundancy, artificial movement corridors, and other measures.

**Response ORG 8-7**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001444 and 0001445* of the Final Connect SoCal Plan.

**Letter ORG 9: Center for Demographic Research**

Deborah Diep, Director  
Center for Demographic Research  
1121 N. State College Blvd, Suite 238  
Fullerton, CA 92833

January 24, 2020

**Response ORG 9 –1**

The comment provides a set of introductory comments. No specific response is necessary. For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001560 and 0001561* of the Final Connect SoCal Plan.

**Response ORG 9-2**

The comment provides further introductory comments. No specific response is necessary.

**Response ORG 9-3**

The comment requests clarification on the identified terms. The following terms are defined in the RTP/SCA glossary: Livable Corridors, Neighborhood Mobility Areas. The remaining terms have been added to the glossary See Chapter 10.0 Corrections and Additions for page 7.0-1. Definitions for “orientation”, “timing” “mobility options” and “destinations” are not provided as they are common terms.

**Response ORG 9-4**

The sources for tables have been updated as appropriate. See **Chapter 10.0, Corrections and Additions**.

**Response ORG 9-5**

The comment suggests all interpolated data should be marked in tables. See **Master Response No. 3: Baseline Conditions**. As described in the master response, the base year for the Plan is 2016. For purposes of the PEIR, 2019 data has been estimated based on an interpolation of 2016 to 2045 projections. Available data that differs from this generalized explanation and used to determine existing conditions is specified in each topical section in Chapter 3.0, Environmental Impact Analysis and Mitigation Measure.

**Response ORG 9-6**

The comment requests clarification regarding lane miles. See **Chapter 10.0, Corrections and Additions**, for page ES-9.

**Response ORG 9-7**

The comment requests an edit. The requested edits were not made as they are not necessary to the text.

**Response ORG 9-8**

The comment suggests replacing the word “foresee” with “envision.” The comment suggests an edit. See **Chapter 10.0, Corrections and Additions**, for page ES-9.

**Response ORG 9-9**

The comment suggests adding the words “to replace the gas tax”. The suggested edit was not made. See response to **SUB 1-14** and **SUB 1-20**.

**Response ORG 9-10 through ORG 9-23**

Refer to **Response SUB 1-9** regarding “where applicable and feasible” language in mitigation measures.

**Response ORG 9-24**

The comment relates to SCAG committees. Refer to **Response SUB 1-50**.

**Response ORG 9-25**

The comment suggests all interpolated data should be marked in tables. Refer to **Response ORG 9-5**.

**Response ORG 9-26**

The comment points to a typographical error. See **Chapter 10.0 Corrections and Additions** for page 1.0-13.

**Response ORG 9- 27**

The comment requests clarification on the accelerated tomorrow alternative. See **Chapter 10.0, Corrections and Additions**, for page 1.0-15.

**Response ORG 9-28**

The comment provides suggested edits. See **Chapter 10.0, Corrections and Additions**, for page 3.11-3.

**Response ORG 9- 29**

The comment provides suggested edits. See **Chapter 10.0, Corrections and Additions**, for page 3.11-5.

**Response ORG 9- 30**

The comment relates to SCAG committees. Refer to **Response SUB 1-50**.

**Response ORG 9- 31**

The comment suggests an edit. See **Chapter 10.0 Corrections and Additions**, for page 3.11-12.

**Response ORG 9-32**

The comment suggests an edit. See **Chapter 10.0 Corrections and Additions**, for page 3.11-15.

**Response ORG 9-33**

The comment suggests an edit. See **Chapter 10.0, Corrections and Additions** for page 3.11-20.

**Response ORG 9-34**

The comment requests clarification on the coastal zone. See **Chapter 10.0, Corrections and Additions** for page 3.11-22.

**Response ORG 9-35**

The comment suggested additional language regarding the HCD RHNA determination to page 3.11-32 of the PEIR. Refer to **Response to SUB 1-52**.

**Response ORG 9-36**

The comment suggests an edit to page 3.11-32 of the PEIR. See **Chapter 10.0 Corrections and Additions** for page 3.11-32.

**Response ORG 9-37**

The comment suggests additional narrative for page 3.11-33 regarding the HCD and RHNA process. Refer to **Response SUB 1-52**.

**Response ORG 9- 38**

The comment suggests an edit that is not necessary.

**Response ORG 9-39**

The comment requests clarification on regional policies. In the context of this sentence “regional policies” refers to policies that go beyond local jurisdictions. Examples include promote a green region, promoting low emission technologies, planning for growth near transit investments, and promoting the redevelopment of underperforming retail development. Additional policies are in Chapter 2.0 Project Description of the PEIR and in the Plan.



**Response ORG 9-40**

The comment requests clarification on the statement regarding individual numbers. See **Chapter 10.0 Corrections and Additions** for page 3.11-45.

**Response ORG 9- 41**

The comment provides suggested edits, see **Chapter 10.0 Corrections and Additions** for page 3.11-45.

**Response ORG 9- 42**

The comment requests clarifications on where general plans are applicable. General plans are applicable within each city or county. According to state law, “[d]ecisions involving the future growth of the state, most of which are made and will continue to be made at the local level, should be guided by an effective planning process, including the local general plan, and should proceed within the framework of officially approved statewide goals and policies directed to land use, population growth and distribution, development, open space, resource preservation and utilization, air and water quality, and other related physical, social and economic development factors.” (Gov Code § 65030.1) Because general plans apply within cities and counties, areas outside of a city or county, such as federally managed lands, might not be subject to general plans.

**Response ORG 9-43**

The comment suggests an edit. See **Chapter 10.0, Corrections and Additions**, for page 3.14-1.

**Response ORG 9- 44**

The comment requests additional information added to the definition of “housing” provided on page 3.14-1. Details requested including source information are provided on page 3.14-1.

**Response ORG 9-45**

The comment requests clarification on why jurisdictions may have different housing unit definitions. Local jurisdictions have discretion in terms of how a housing unit is defined.

**Response ORG 9-46**

The comment requests an update to the source on page 3.14-2. The source used to determine the approximate number of residents in the SCAG region was determined in 2018 and was referenced properly. No update is needed. See also **Master Response No. 3: Baseline Conditions**.

**Response ORG 9- 47**

The comment requests modifications to the sources in Table 3.14-1, Population Growth in the SCAG Region (2000-2019). All sources have been updated as appropriate.

**Response ORG 9- 48**

The comment suggests an edit. See **Chapter 10.0, Corrections and Additions**, for page 3.14-4.

**Response ORG 9- 49**

The comment requests modifications to the source for Table 3.14-2. See **Chapter 10.0, Corrections and Additions**, for page 3.14-4.

**Response ORG 9- 50**

The comment suggests edits to the source information regarding household income. The data and source as stated are correct.

**Response ORG 9- 51**

The comment suggests edits to source information for Table 3.14-3, Household Size in the SCAG Region (Persons). See **Chapter 10.0, Corrections and Additions**, for page 3.14-5.

**Response ORG 9- 52**

The comment suggests edits to source information for Table 3.14-4, Poverty Rates in the SCAG Region (1990-2017). See **Corrections and Additions** for page 3.14-6.

**Response ORG 9- 53 and ORG 9-54**

The comment relates to source information for Table 3.14-5, 2019 Employment by County, 3.14-6, Employment Growth for 2000 to 2019, Table 3.14-7, Unemployment Rates and 3.14-8, 2019-2045 Population, Households, and Employment Projections in the SCAG Region. Table sources have been updated as appropriate; see **Chapter 10.0 Corrections and Additions**.

**Response ORG 9- 55**

The comment relates to guiding principles of the Plan. See **Chapter 10.0 Corrections and Additions** for page 2.0-21.

**Response ORG 9- 56**

The comment relates to RHNA. See **Responses SUB 1-58 and SUB 1-52 and Master Response No. 7: Regional Housing Needs Assessment**.

**Response ORG 9-57**

The comment presents a text change. See **Chapter 10.0, Corrections and Additions**, for page 3.14-20.

**Response ORG 9-58**

The comment presents a text change. See **Chapter 10.0, Corrections and Additions**, for page 3.14-23.

**Response ORG 9- 59**

The comment presents a text change portions of the text were not changed as the suggested word choice did not accurately reflect the intent of the statement. Refer to **Chapter 10.0, Corrections and Additions**, for page 3.14-27.

**Letter ORG 10: Climate Resolve**

Jonathan Parfrey Executive Director  
Climate Resolve  
525 Hewitt St.  
Los Angeles, Ca 90013

January 24, 2020

**Response ORG 10-1**

The comment provides a set of introductory comments. No specific response is necessary. For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001558* of the Final Connect SoCal Plan.

**Response ORG 10-2**

The commenter asserts that it is insufficient to use 2012 GHG emission data in 2020 and recommends SCAG blend-in CARB data to evaluate emissions. See **Response ORG 10-16** for a more detailed response to this summary comment.

**Response ORG 10-3**

The commenter states that the Public Health subsection, on Section 3.8, Greenhouse Gases (page 3.8-16), of the Draft PEIR, is insufficient and includes recommendations. See Response ORG 10-18 for a more detailed response to this summary comment.

**Response ORG 10-4**

The commenter states that an assessment of compliance with SB 379, SB 1000, and LHMPs should be added to Table 3.8-4 California Jurisdictions Addressing Climate Change in the SCAG Region (2019). The commenter states that Climate Resolve is willing to share this information with SCAG. See **Response ORG 10-22** for a more detailed response to this summary comment.

**Response ORG 10-5**

The commenter states that Final PEIR should state California's current position on GHG reduction, specifically referring to EO B-55-18 that commits the state to carbon neutrality by 2045. Section 3.8 is revised to reflect this comment. See **Chapter 10.0, Corrections and Additions**, for page 3.8-37.

**Response ORG 10-6**

The comment suggests specific edits to Section 3.8, Greenhouse Gases, that relates to GHG emissions. Section 3.8 is revised to reflect this comment. See **Chapter 10.0, Corrections and Additions**, for page 3.8-1.

**Response ORG 10-7**

The comment suggests specific edits to Section 3.8, Greenhouse Gases, related to GHG emissions. Section 3.8 is revised to reflect this comment. See **Chapter 10.0, Corrections and Additions** for page 3.8-1.

**Response ORG 10-8**

The comment suggests specific edits to Section 3.8, Greenhouse Gases, related to GHG emissions. Section 3.8 is revised to reflect this comment. See **Chapter 10.0, Corrections and Additions** for page 3.8-2.

**Response ORG 10-9**

The comment suggests specific edits to Section 3.8, Greenhouse Gases, relates to GHG emissions. Section 3.8 is revised to reflect this comment. See **Chapter 10.0 Corrections and Additions**, for page 3.8-3.

**Response ORG 10-10**

The comment suggests specific edits to Section 3.8, Greenhouse Gases, related to GHG emissions. Section 3.8 is revised to reflect this comment. See **Chapter 10.0, Corrections and Additions**, for page 3.8-5.

The commenter also states that SCAG should have included peer-reviewed climate studies with their analysis. A discussion of the State of California's Fourth Climate Assessment is included in Section 3.8. See **Chapter 10.0, Corrections and Additions**, for page 3.8-5.

**Response ORG 10-11**

Climate Resolve notes that on Section 3.8, Greenhouse Gases (p 3.8-6), SCAG referenced global glacier loss and recommends that SCAG cite California specific glacier loss information from the 2018 OEHHA climate indicators and cite the report for migration of species. This information was added to Section 3.8, Greenhouse Gases. See **Chapter 10.0, Corrections and Additions**, for page 3.8-6.

Additionally, Climate Resolve recommends that reference 10 be updated to more recent snowmelt information. The change to snowmelt information from California's Fourth Climate Change Assessment has been made in Section 3.8, Greenhouse Gases. See **Chapter 10.0, Corrections and Additions**, for page 3.8-6.

**Response ORG 10-12**

The comment suggests specific edits to Section 3.8, Greenhouse Gases, related to GHG emissions. Additionally, the commenter recommends adding reference to a wildfire study by Jin, Randerson, et al and reports published by the Southern California Coastal Water Research Project. Section 3.8 is revised to reflect this comment. See **Chapter 10.0, Corrections and Additions**, for page 3.8-8.

**Response ORG 10-13**

The comment suggests adding regionally specific studies related to flood events. A discussion of the flood risks presented in the Santa Ana Watershed Basin is included in Section 3.8, Greenhouse Gases. See **Chapter 10.0, Corrections and Additions**, for page 3.8-9. The Los Angeles Basin and Southeast Basin Studies were not included in this discussion as these studies only evaluated the future water demand and supply and did not address flooding events in the region.

**Response ORG 10-14**

The comment suggests including an analysis of the global cumulative GHG emissions. Section 3.8 is revised to reflect this comment. See **Chapter 10.0, Corrections and Additions**, for page 3.8-11.

**Response ORG 10-15**

The commenter asserts that Table 3.8-3, GHG Emissions in California (2000 and 2017) is based on IPCC GHG emissions data and questions why CARB data was not used within the table. However, the numbers in the Table 3.8-3 reflect CARB's latest GHG data, the information is simply split by IPCC category. The table states that the total GHG emissions within the state of California in 2017 was approximately 424.1 MMT CO<sub>2e</sub>, comprised of 39.8% transportation emissions. Similarly, review of CARB's *California Greenhouse Gas Emissions Inventory: 2000-2017* Report demonstrates that CARB estimated the state's 2017 GHG emissions to be 424 MMT CO<sub>2e</sub> and transportation accounts for 40%. Therefore, CARB data was used within Table 3.8-3 and revisions are not required.

**Response ORG 10-16**

The commenter asserts that it is incorrect to use 2012 GHG data to analyze emissions within the SCAG region and suggests using statewide GHG emissions. As stated in Section 3.8, Greenhouse Gases, the most recent GHG emissions data by sector for the SCAG region is from 2012. This information was appropriately used. More recent statewide emissions are presented in Table 3.8-3 to demonstrate emissions by sector across the state, however the information from 2012 is to demonstrate the difference in GHG sector emissions that make up the SCAG region as compared to the state. Section 3.8 was revised to reflect this comment. See **Chapter 10.0, Corrections and Additions**, for page 3.8-14.

**Response ORG 10-17**

According to the SCAQMD's Appendix VI: Black Carbon Measurements at Fixed Sites from the *MATES IV Final Report*, black carbon is a component of both fine and coarse particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). While black carbon is unregulated, federal and state regulations of PM<sub>2.5</sub> and PM<sub>10</sub> have resulted in significant declines in PM concentrations. Regulations and reduction strategies can control atmospheric concentrations of black carbon either by directly reducing diesel emissions or indirectly by reducing total

PM emissions.<sup>41</sup> The Port of Los Angeles and the Port of Long Beach each have created incentive programs in order to reduce diesel emissions at the ports from ships, including: (1) Vessel Speed Reduction in order to reduce ship speeds up to 40 nautical miles from entering the harbor; (2) Port of Los Angeles Environmental Ship Index to provide financial incentives for ships with the newest engines; (3) Port of Long Beach's Green Ship Incentive Program to provide financial incentives for ships with the newest engines; and (4) Shore Power requiring ships to plug into the electrical grid while loading and unloading cargo rather than idling with auxiliary engines.<sup>42</sup>

In the Final PEIR, project-level mitigation has been added to PMM-AQ-1 to encourage relevant projects to engage in these programs, which will reduce diesel emissions and black carbon at the ports. Therefore, while black carbon emissions are not specifically quantified within the Draft PEIR, they are expected to decrease by the Plan horizon year. See **Chapter 10.0, Corrections and Additions**, for page 3.8-15.

#### **Response ORG 10-18**

The comment suggests that the "Public Health" sub-section is insufficient and recommends relevant studies in order to enhance the section. The comment also suggests specific edits to Section 3.8, Greenhouse Gases, which relates to GHG emissions. Section 3.8 is revised to reflect this comment. See **Chapter 10.0 Corrections and Additions** for page 3.8-16.

#### **Response ORG 10-19**

The comment suggests specific edits to Section 3.8, Greenhouse Gases, related to GHG emissions. Section 3.8 is revised to reflect this comment. See **Chapter 10.0, Corrections and Additions**, for page 3.8-17.

The comment also suggests that the seven adaption strategies listed to shift community design are insufficient and SCAG should consider including more strategies. As stated within the Draft PEIR, SCAG is not limited to the strategies listed with Section 3.8, Greenhouse Gases. Regardless, Section 3.8 is revised to reflect this comment. See **Chapter 10.0 Corrections and Additions**.

#### **Response ORG 10-20**

The comment suggests specific edits to Section 3.8, Greenhouse Gases, which relates to state regulations. Section 3.8 is revised to reflect this comment. See **Chapter 10.0, Corrections and Additions**, for page 3.8-27.

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<sup>41</sup> SCAQMD. *Appendix VI Mates IV Final Report*. Available online at: <http://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/f-appendix.pdf?sfvrsn=7>, accessed February 19, 2020.

<sup>42</sup> Clean Air Action Plan. *Ships*. Available online at: <https://cleanairactionplan.org/strategies/ships/>, accessed February 19, 2020.

**Response ORG 10-21**

The comment suggests specific edits to Section 3.8, Greenhouse Gases, which relates to local regulations. Section 3.8 is revised to reflect this comment. See **Chapter 10.0, Corrections and Additions**, for page 3.8-49.

**Response ORG 10-22**

The comment suggests specific edits to Section 3.8, Greenhouse Gases, which relates to local regulations. Section 3.8 is revised to reflect this comment. See **Chapter 10.0, Corrections and Additions**, for page 3.8-51

The comment also requests SCAG to updated Section 3.8, Greenhouse Gases, to include hyperlinks within Table 3.8-4, California Jurisdictions Addressing Climate Change in the SCAG Region (2019), to direct readers to an individual plan and not to the municipalities' websites. Many municipalities include several reduction plans. For example, the City of Burbank includes a GHG Reduction Plan, Climate Action Plan, Sustainability Plan, General Plan Policy, and General Plan Implementation Measures that all address GHG emissions in the City. Providing the hyperlink to the municipality's website allows readers to find each of these documents instead of linking the reader to one of them.

The comment suggests adding columns to Table 3.8-4 that identifies municipalities that include GHG reduction policies and/or climate change adaptation strategies within their general plans to sense how well each general plan assesses climate change. The table already includes columns to list municipalities that include GHG policies or adaption strategies within the General Plan, see columns titled "General Plan Policy" and "General Plan Implementation Measures." SCAG acknowledges that some cities prepare an adaptation plan or resilience plan within the general plans, however the intent of the table is to demonstrate which municipalities are providing policies, programs, and plans to reduce GHG emissions and prepare for climate change, not the extent to which the General Plan addresses these issues.

The comment suggests adding an assessment of compliance with SB 379, SB 1000, and LHMPs which can be provided by Climate Resolve. SCAG thanks Climate Resolve for being willing to share this information and may request this information for the analysis of future documents.

**Response ORG 10-23**

The comment suggests specific edits to Section 3.8, Greenhouse Gases, which relates to GHG emissions. Section 3.8 is revised to reflect this comment. See **Chapter 10.0, Corrections and Additions**.



**Response ORG 10-24**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001558* of the Final Connect SoCal Plan.

**Letter ORG 11: Daniel Burruel**

Daniel Burruel  
Keep Nuevo Rural

No Date

**Response ORG 11-1**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001309* of the Final Connect SoCal Plan. The comment is generally supportive of open space conversation and wildlife corridors and expresses opposition to a specific project in the unincorporated community of Nuevo. SCAG does not have land use authority to approve or disapprove local plans. See **Master Response No. 2: Program EIR vs. Project EIR.**

**Letter ORG 12: UNITE HERE**

Charles Du, Staff Attorney  
 UNITE HERE Local 11  
 464 Lucas Ave, Suite 201  
 Los Angeles, CA 90017

January 24, 2020

**Response ORG 12-1**

The commenter introduces themselves and their interests. No specific response is required. For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001448* of the Final Connect SoCal Plan.

**Response ORG 12-2**

The commenter introduces the specific comments below. See specific responses below. For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001448* of the Final Connect SoCal Plan.

**Response ORG 12-3**

The commenter questions the GHG targets and references Table 3.8-10, SB 375 Analysis. Table 3.8-10 identifies per capita GHG emissions from cars and light duty trucks (in accordance with SB 375) for the years 2005 (Baseline), 2020 (Plan) and 2035 (Plan) and identifies reductions 2020 Plan compared to 2005 baseline and 2035 Plan compared to baseline. Table 3.8-10 shows that the SCAG Region would achieve the emissions reductions targets (-8% 2005 to 2020 and - 19% 2005 to 2035). The SB 375 reduction targets are established by CARB in accordance with the requirements of SB 375. SB 375 is discussed starting on Section 3.8, Greenhouse Gases (p 3.8-31). CARB Target Setting is a complex process involving many steps. Commenter is referred to the CARB web site for further information on target setting.<sup>43</sup> CARB does not set specific targets for individual counties or other jurisdictions within the SCAG region. SCAG has not developed such targets either. Individual jurisdictions within the SCAG region are responsible for ensuring consistency with the RTP/SCS and associated targets. SB 375 included CEQA streamlining provisions for certain types of projects (See Chapter 1.0, Introduction (p 1.0-23)).

**Response ORG 12-4**

The commenter questions what type of projects the SB 375 targets are applicable to. As noted in **Response ORG 12-3** above, individual jurisdictions may use the SB 375 targets as they see fit. SB 375 provides CEQA streamlining for transit priority projects as well as residential and mixed-use residential projects.

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<sup>43</sup> <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets>; accessed February 14, 2020

**Response ORG 12-5**

The commenter questions how the term “per capita” is to be applied – whether to residential or residents and employees. At the regional scale the per capita calculation is total miles divided by total population; therefore, at the regional scale only residents are included in the calculation. However, at smaller scales, each jurisdiction must determine how to calculate per capita emissions for employment and mixed-use projects. Ignoring emissions from projects that include an employment component may lead to GHG impacts of an individual project being underestimated.

**Response ORG 12-6**

The commenter asks about the trajectory of emissions. The trajectory is for SB 375 and total GHG emissions to continue decreasing. SB 375 does not have interim target years or target years beyond 2035. However, other regulations have targets for total emissions for interim years and years beyond 2035 – see discussion starting on Section 3.8, Greenhouse Gases (p 3.8-73) regarding consistency of the Proposed Plan with these regulations.

**Response ORG 12-7**

The commenter asks why EMFAC2007 is used to calculate 2005 emissions and EMFAC2014 is used for 2020 and 2035. EMFAC2007 includes emission factors for the year 2005; EMFAC 2014 does not. EMFAC2014 was the most recent emission factor modeling tool available when analysis of the Connect SoCal Plan began. See **Master Response No. 4: Technical Process/Modeling**.

**Response ORG 12-8**

The commenter refers to Table 3.8-11, Population and VMT (2019 and 2045), and how “targets” identified in this table were developed. Table 3.8-11 identifies total population, total VMT and VMT per capita for light duty vehicles and all vehicles. The table does not identify targets, it identifies results of the SCAG modeling. See **Master Response No. 4: Technical Process/Modeling** regarding SCAG’s overall modeling process.

**Response ORG 12-9**

The commenter asks about whether these VMT “targets” are for all project types. See **Response LOC 12-4**. Also, as discussed in **Response ORG 12-3** above the emissions are calculated based on total VMT in the region divided by total population in the region. As indicated in **Response ORG 12-5**, at scales smaller than the region, different jurisdictions may choose to calculate GHG emissions from an individual project based on both residential population and employment in order to appropriately assess project impacts.

**Response ORG 12-10**

The commenter asks about the trajectory of VMT reductions and interim year targets. SCAG is not required to meet any regional VMT reduction target, rather only the GHG reduction targets set by CARB. Section 3.8, Greenhouse Gases, Table 3.8-10, SB 375 Analysis, shows 2020 and 2035 GHG reductions. Similarly, the trajectory of per capita VMT is downward. . Other jurisdictions have recommended VMT targets, see discussion starting on Section 3.17 Transportation, Traffic and Safety (p 3.17-53).

**Response ORG 12-11**

The commenter asks to clarify if the VMT are from residential population or also employees. See **Response ORG 12-9**.

**Response ORG 12-12**

The commenter asks what data/metrics are specific to employee trips. As noted in **Response ORG 12-9**, SCAG calculates per capita VMT only based on total population. For jurisdictions that evaluated per capita VMT for employment projects, each jurisdiction must decide on relevant data and calculation methodology.

**Response ORG 12-13**

The commenter asks about VMT projections for residential and employee populations and disaggregated data for cities and counties within the SCAG Region. SCAG did not calculate VMT at a scale smaller than the region. Each jurisdiction is responsible for determining consistency with the Connect SoCal Plan including the regional GHG targets. Each jurisdiction is responsible for assessing transportation/VMT impacts for individual projects in accordance with methodologies established by each jurisdiction. See **Master Response No. 2 Program EIR vs. Project EIR**.

**Response ORG 12-14**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001448* of the Final Connect SoCal Plan.

**Response ORG 12-15**

The commenter provides introductory text to the specific comments (12-16 through 12-21) below, regarding four specific SCAG GHG mitigation measures (SMM GHG-1 through SMM GHG-4, Section 3.8, Greenhouse Gases [p. 3.8-68]). See responses to specific comments below.

**Response ORG 12-16**

The commenter questions language in the mitigation measures and whether the language represents enforceable performance standards. The mitigation measures require SCAG to “continue to work with”

local agencies, “encourage efficient design” and “pursue partnerships.” SCAG is a regional agency with no authority over local jurisdictions. The mitigation measures include enforceable language (SCAG can monitor whether they have worked with local agencies, encouraged efficient design and sought out partnerships. See **Master Response No. 5: Approach to Mitigation Measures.**

**Response ORG 12-17**

The commenter asks what would be required to satisfy the measures. To satisfy these mitigation measures SCAG must be able to document that they worked with local agencies, encouraged efficient design and sought out partnerships. SCAG monitors mitigation measures through two primary ways, first, SCAG has prepared a mitigation monitoring and reporting program for this PEIR which details the measure and the party responsible for monitoring implementation. Second, SCAG comments on project level EIRs of regional significance through its Intergovernmental Review (IGR) process. As part of this process, SCAG can comment on project level mitigation measures.

**Response ORG 12-18**

The commenter asks what specific criteria can be used to objectively determine compliance with the measures. To document compliance with these measures SCAG can use meeting minutes, published programs, policies and grants as well as other documentation of their efforts to comply with these measures. See **Response ORG 12-17.**

**Response ORG 12-19**

The commenter asks what specific performance-based criteria apply to non-specific measures. The mitigation measures are written in order to allow each jurisdiction to apply performance criteria based on their individual location, constraints and specific priorities and judgments. See **Master Response No. 5: Approach to Mitigation Measures**

**Response ORG 12-20**

The commenter asks why the mitigation measures do not require specific actions to meet specific reduction targets. The reason that SCAG does not include specific targets for local jurisdictions is because SCAG has no authority over local jurisdictions and imposing such targets on local jurisdictions would be outside SCAGs jurisdiction and authority. In addition, each jurisdiction in the SCAG region has vastly different circumstances, determining appropriate targets for each jurisdiction would require considerable data as well as local-level decision-making to determine what is appropriate. See **Master Response No. 5: Approach to Mitigation Measures.**

**Response ORG 12-21**

The commenter asks what mitigation measures were found infeasible. During the development of the PEIR, SCAG sought input from the agencies, organizations and the public on the scope of the environmental document. SCAG also held public workshops specifically to gain input on the mitigation measures. During that process, SCAG did not identify any mitigation measures that were found infeasible. SCAQMD suggested mitigation measures that SCAG is not incorporating into the Final PEIR. In each instance SCAG explains why it has not added the measure. See **Responses REG 2-25** and **REG 2-26**.

**Response ORG 12-22**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001448* of the Final Connect SoCal Plan.

**Response ORG 12-23**

Commenter references comments above and requests notice of all CEQA actions or hearings. See detailed responses above. Commenter will receive notice of the availability of the Final EIR and scheduled actions on the Connect SoCal Plan and PEIR.

**Letter ORG 13: Southern California Leadership Council Et., al**

Southern California Leadership Council  
Building Industry Association of Southern California  
Engineering Contractors' Association  
California Building Industry  
Construction Industry Air Quality Coalition  
Inland Empire Economic Partnership  
Southern California Partnership for Jobs  
NAIOP SoCal  
Southern California Contractors Association

January 24, 2020

**Response ORG 13-1**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001455 and 0001463* of the Final Connect SoCal Plan.

**Response ORG 13-2**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001455 and 0001463* of the Final Connect SoCal Plan.

**Response ORG 13-3**

For additional information regarding housing affordability, please refer to the Sustainable Communities Strategy Technical Report of the Final Connect SoCal Plan. Also, for responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001455 and 0001463* of the Final Connect SoCal Plan.

**Response ORG 13-4**

For additional information regarding housing affordability, please refer to the Sustainable Communities Strategy Technical Report of the Final Connect SoCal Plan. Also, for responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001455 and 0001463* of the Final Connect SoCal Plan.

**Response ORG 13-5**

For additional information regarding housing affordability, please refer to the Sustainable Communities Strategy Technical Report of the Final Connect SoCal Plan. Also, for responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001455 and 0001463* of the Final Connect SoCal Plan.

**Response ORG 13-6**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001455 and 0001463* of the Final Connect SoCal Plan.



**Response ORG 13-7**

For additional information regarding housing affordability, please refer to the Sustainable Communities Strategy Technical Report of the Final Connect SoCal Plan. Also, for responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001455 and 0001463* of the Final Connect SoCal Plan.

**Response ORG 13-8**

For additional information regarding housing affordability, please refer to the Sustainable Communities Strategy Technical Report of the Final Connect SoCal Plan. Also, for responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001455 and 0001463* of the Final Connect SoCal Plan.

**Response ORG 13-9**

For additional information regarding housing affordability, please refer to the Sustainable Communities Strategy Technical Report of the Final Connect SoCal Plan. Also, for responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001455 and 0001463* of the Final Connect SoCal Plan.

**Response ORG 13-10**

For additional information regarding housing affordability, please refer to the Sustainable Communities Strategy Technical Report of the Final Connect SoCal Plan. Also, for responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001455 and 0001463* of the Final Connect SoCal Plan.

**Response ORG 13-11**

The comment provides a set of general remarks regarding Connect SoCal and SB 375 targets. See **Master Response No. 1: General Comments and Non-CEQA Issues**.

**Response ORG 13-12, 13-13, and 13-14**

The comment asserts that the PEIR fails to identify feasible mitigation measures for the reasonably foreseeable consequence of the implementation of the Plan and fails to disclose the scale and significance of unavoidable adverse impacts. See **Master Response No. 2: Program EIR vs. Project EIR**; the PEIR appropriately evaluates the Connect SoCal Plan at the regional scale, identifies significant impacts and appropriately identifies feasible mitigation measures. See **Master Response No. 5: Approach to Mitigation Measures**.

Section 3.15, Public Services, and Section 3.19, Utilities and Service Systems, both evaluate the potential impact the Plan could have on infrastructure and associated service systems. Such impacts include inadequate wastewater treatment capacity, water supply, impacts from construction of new facilities and so on. The PEIR generally recognizes that more growth and development in urban areas would affect existing infrastructure (the aging of which is a pre-existing issue).

The PEIR states the following in Chapter 4.0, Alternatives (p 4.0-48), “[f]or purposes of this PEIR, the impacts associated with reducing global GHG emissions and regional air pollutants must be examined alongside the other adverse impacts that are caused by increasing the density and intensity of the region’s development patterns and, for example, bringing people closer to sources of air pollutants such as transit corridors and freeways (even though these sources would have fewer emissions in the future, despite increasing traffic, due to emission controls). The tension between CEQA’s mandate to reduce all types of impacts to the maximum extent feasible, and the statutory mandates of reducing GHG emissions under AB 32, SB 32 and SB 375, is a well-recognized CEQA compliance challenge.<sup>44</sup> CEQA does not provide any legal mechanism for “weighting” environmental impacts, and scoring some categories of impacts as “more important” and others as “less important.” Instead, CEQA is structured to require the disclosure of all impacts for each alternative and the Plan, to foster informed decision making and to disclose the inherent trade-offs between different types and magnitudes of impacts associated with different alternatives.

Please refer to Section 3.13, Noise, for discussion of potential noise impacts associated with the Plan as well as Section 3.3, Air Quality, for a discussion of potential air quality impacts associated with the Plan. Although the land use pattern is generally known, site specific impacts cannot be reliably identified, nor is it appropriate for a program level document to do so. The PEIR generally identifies the types of impacts that could occur over the lifetime of the Plan and conservatively identifies such impacts as being significant and unavoidable.

First of all, the reasonably foreseeable demolition and displacement of existing uses in or near transit stations and corridors were examined at the regional level for the SCAG region as a whole (see, for example, qualitative discussion of construction air quality impacts, Section 3.3, Air Quality [page 3.3-54]).

Second, with respect to the purported increase in “supercommuters,” this assertion is speculative. See **Response ORG 4-7**.

Third, with respect to the assertion that there will remain no practical, fixed route public transit options to serve the distantly-residing construction workers and other middle-class households, this again is speculative. Connect SoCal includes \$66.8 billion dollars in transit, and \$136 billion is dedicated to system maintenance. In addition to funding specifically for transit, Connect SoCal includes a comprehensive set of policies, strategies, and multi-modal services and infrastructure investments to

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<sup>44</sup> Adams, Tom (California League of Conservation Voters), and Amanda Eaken and Anne Nothoff (Natural Resources Defense Council). 2010. Tackling California’s Global Warming Challenge: A Guide to SB 375, by Tom Adams (California League of Conservation Voters), p. 24. Available at: <https://www.nrdc.org/sites/default/files/sb375.pdf>

support all modes of travel and promote a reduction in single-occupancy vehicle (SOV) travel to help the region meet its mobility and sustainability goals. Connect SoCal prioritizes growth near high quality transit, to maximize the effectiveness of the region’s existing and planned transit system. The commenter also cites a report from UCLA.<sup>45</sup> The report in fact states that density makes transit service *more* effective by putting large numbers of trip origins and destinations close to transit. Additionally, UCLA states that the evidence regarding neighborhood change and transit use is “far from conclusive” and “warrants substantial further research.” SCAG is currently working with UCLA to further study the effects of neighborhood change on transit use.

Finally, commenter asserts that the PEIR fails to analyze impacts related to out-migration caused by the draft Connect SoCal’s foreseeable worsening of the housing supply and affordability crises. SCAG disagrees with the commenters premise that the construction of infill housing would necessarily result in higher housing prices overall. While many factors contribute to the high cost of housing in California, housing prices can reasonably be anticipated to be reduced overall through the consistent addition of housing stock and increases in supply, consistent with standard economic theories. As such, these assertions are speculative. For additional information regarding affordable housing, please refer to the Sustainable Communities Strategy Technical Report of the Final Connect SoCal Plan.

In sum, it would be speculative for the PEIR to identify the potential localized impacts referenced by Commenter that could occur as a result of the Plan as there are countless factors that would affect such impacts. For example, factors such as speed of housing development, timing for transportation projects, changes in technology (i.e., micro transit, etc.) as well as external factors such as market conditions and even legislation being considered at the state level are uncertain. As such, the specific potential impacts raised by commenter are not “reasonably foreseeable.” It is not the role of the PEIR to speculate as to which of these factors might interact with any other of these factors, but rather to evaluate the broad programmatic impacts that are reasonably foreseeable. See **Master Response No. 2: Program EIR vs. Project EIR**.

#### **Response ORG 13-15**

The comment relates to mitigation measures. The PEIR includes mitigation measures for SCAG and for project sponsors. Refer to **Master Response No. 5: Approach to Mitigation Measures** and the Executive Summary which lists all proposed mitigation measures. The commenter suggests measures such as reducing housing costs through accelerated and by-right approvals. While SCAG does not have land use authority to create by-right approvals, SCAG does offer CEQA streamlining opportunities through this

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<sup>45</sup> UCLA, “Falling Transit Ridership: California and Southern California,” available at: <https://www.its.ucla.edu/2018/01/31/new-report-its-scholars-on-the-cause-of-californias-fallingtransit-ridership/>

PEIR (see Chapter 1.0 Introduction) which can create accelerated approvals. Further, Section 3.14 includes a number of measures (SMM POP-1 through SMM POP-4) aimed at reducing the cost of housing through technical assistance.

**Response ORG 13-16**

The comment asserts that the PEIR does not analyze the foreseeable failure of VMT reduction policies and suggests SCAG should look at other methods of GHG reduction beyond VMT. The commenter provides no substantial evidence to support the claim that VMT strategies (identified and supported by the State of California and numerous other organizations as an appropriate GHG reduction strategy) will fail. The PEIR focuses on GHG reductions from the transportation network because SCAG is a Metropolitan Planning Organization (MPO) responsible for regional transportation planning. SCAG does not have purview over land use, ships, trains or stationary sources, as such contemplating VMT reduction measures for areas other than transportation would be far outside SCAG's mandate. Further, CARB has set GHG reduction targets for SCAG (and other MPOs) to reduce transportation related GHG emissions. VMT is the primary tool SCAG uses to reduce GHG emissions as VMT and GHGs are closely tied and VMT is related to transportation.

**Response ORG 13-17**

The comment relates to the Regional Housing Needs Assessment. Refer to **Master Response 7: Regional Housing Needs Assessment**. SCAG disagrees that the existing need is in fact cumulative to the Plan.

**Response ORG 13-18**

The comment suggests that the draft PEIR should be revised to include an alternative consistent with the issues raised in the letter.

Chapter 4.0 Alternatives includes the rationale for the selection of alternatives (page 4.0-1 and 4.0-2). As discussed, the range of alternatives required in an EIR is governed by a "rule of reason." Therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project. An EIR does not need to consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative. SCAG selected a total of three alternatives to the project that would be feasible and would obtain the project objectives. These alternatives consisted of a number of variables related to land use and transportation including compact or infill development, amount of development in HQTAs, location and intensity of transit service, and level of investment in TDM. Generally, the alternatives represent a progression of land use and transportation investments, such that the Existing-Plans Alternative includes the most dispersed land use and fewest transportation investments and Intensified Land Use Alternative represents the most compact land use pattern but maintains the same transportation investments as the Plan. Consideration of alternatives requires careful

examination of the multiple facets of each alternative. For example, while urban development may preserve farmland or other natural resources, it could place a burden on urban parks, schools, police and fire services, and aging infrastructure. There is no evidence presented by the commenter that suggests the impacts of the suggested “ameliorative” housing alternative would be any different than those presented in Chapter 4.0. Therefore, there is no need to evaluate such an alternative.

**Response ORG 13-19**

The comment is a summary of issues raised in the letter. Please refer to **Responses ORG 13-13 through 18** above. SCAG disagrees that the PEIR is deficient and requires recirculation.

**Response ORG 13-20 and 13-21**

The comment presents opinions and summary comments. Please refer to **Responses ORG 13-13 through 18** above.

**Response ORG 13-22 and 13-23**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001463* of the Final Connect SoCal Plan.

**Letter ORG 14: SEIU Southern California**

David Huerta, President  
SEIU United Service Workers West

January 24, 2020

**Response ORG 14-1**

The comment presents a set of general objections to the Plan's air quality analysis and growth forecasts. The comments are responded to individually below. For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001481* of the Final Connect SoCal Plan.

**Response ORG 14-2**

The comment requests clarification on the use of EMFAC2014 for the Plan's transportation conformity determination. See **Master Response 4: Technical Process/Modeling**. Regarding the Plan's growth forecast, commenter is referred to **Master Response No. 7: Regional Housing Needs Assessment**.

**Response ORG 14-3**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001481* of the Final Connect SoCal Plan.

**Response ORG 14-4**

The comment requests additional information regarding EMFAC modeling. See **Master Response 4: Technical Process/Modeling**.

**Response ORG 14-5**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001481* of the Final Connect SoCal Plan.

**Response ORG 14-6**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001481* of the Final Connect SoCal Plan.

**Response ORG 14-7**

As requested, the commenter has been added to the PEIR mailing list.

**Letter ORG-15: Bolsa Chica Land Trust**

Kim Kolpin, Executive Director  
Bolsa Chia Land Trust  
5200 Warner Avenue, Suite 108  
Huntington Beach, CA 92649

January 22, 2020

**Response ORG 15-1**

The comment relates to wildlife corridors. The PEIR found that the Plan would interfere substantially with the movement of native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites and would result in a significant and unavoidable impact (Impact BIO-4). Numerous project level mitigation measures were identified for migratory species. These measures included consulting with “wildlife corridor authorities”; counties, cities, and other local organizations; USFS, CDFW, and USFWS and other agencies for projects that could impact wildlife corridors or migration for project planning. The Plan included project specific mitigation measures to: design proposed projects to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors; conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site; analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor; require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation; pursue mitigation banking to preserve habitat linkages and corridors; design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches; evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat; to provide wildlife crossings in accordance with proven standards; and, where avoidance is not feasible, to design sufficient conservation measures through coordination with local agencies and the regulatory agencies (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. Please refer to **Response ORG 8-6**.

**Letter ORG-16: Friends of Harbors, Beaches, and Parks**

Michael Wellborn, President  
Friends of Harbors, Beaches, and Parks  
P.O. Box 9256  
Newport Beach, CA 92658

January 22, 2020

**Response ORG 16-1**

The comment relates to wildlife corridors and mountain lions. Refer to **Response ORG 8-6**.



**Letter ORG-17: Sierra Club Save Hobo Aliso Task Force**

Penny Elia  
Task Force Chair  
Save Hobo Aliso Task Force  
Sierra Club

January 20, 2020

**Response ORG 17-1**

The comment relates to wildlife corridors and mountain lions. Refer to **Response ORG 8-6**.

**Letter ORG-18: California Cultural Resource Preservation Alliance**

Patricia Martz, Ph.D.  
President, California Cultural Preservation Alliance, Inc.  
P.O. Box 54132  
Irvine, CA 92619

No Date

**Response ORG 18-1**

The comment generally relates to conservation of open space and parkland and protection of cultural resources. SCAG recognizes the value of open space and has incorporated mitigation measures into the PEIR that address open space through farmland protection. For further clarification, see Section 3.2, Agricultural and Forestry Resources.

**Letter IND-1:           Marven Norman**

January 24, 2020

**Response IND 1-1**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001522 and 0001523* of the Final Connect SoCal Plan.

**Letter IND-2: Albert Perdon**

Albert Perdon  
39958 End of the Trail  
De Luz, CA 92028

January 24, 2020

**Response IND 2-1**

The comment relates to environmental review of high-speed train. See **Master Response No. 1: General Comments and Non-CEQA Issues** and **Master Response No 2: Program EIR vs. Project EIR**.

**Letter IND 3: Henry Fung**

**Response IND 3-1**

For responses related to the Connect SoCal Plan, please refer to *Submission IDs 0001325-0001330 and 0001404* of the Final Connect SoCal Plan.

**Response IND 3-2**

The comment requests information on anticipated amendments to the PEIR in response to the final RHNA and Housing Element updates. See **Master Response No. 7: Regional Housing Needs Assessment**.

**Letter IND 4: Jordan Sisson**

**Response IND 4-1**

The comment relates to the public comment period for the PEIR. The PEIR was available beginning December 9, 2019, through January 24, 2020, for a total of 46 days.

**Letter IND 5: Stephanie Johnson and Ghassan Roumani**

Stephanie Johnson  
Ghassan Roumani  
January 24, 2020

**Response IND 5-1**

The comment restates the Plan goals but indicates that possible quality of life impacts in San Marino due to increased traffic are not addressed. See **Master Response No. 1: General Comments and Non-CEQA Issues** and **Master Response No. 2: Program vs. Project EIR**.

**Response IND 5-2**

The comment accurately restates the thresholds of significance in Section 3.17, Transportation, of the PEIR. No specific response is required.

**Response IND 5-3**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001361* of the Final Connect SoCal Plan.

**Response IND 5-4**

For responses related to the Connect SoCal Plan, please refer to *Submission ID 0001361* of the Final Connect SoCal Plan.

**Response IND 5-5**

With respect to the transportation projects in the Plan, these projects are to be implemented by Caltrans, county transportation commissions, local transit agencies, and local governments (i.e., cities and counties), and *not* implemented by SCAG. Additionally, because the focus of the environmental analysis in the PEIR is on a regional scale, site-specific analysis of the projects contained in the Connect SoCal Project List are not individually analyzed (see **Master Response No. 2: Program EIR vs Project EIR**). Congestion is considered in Section 3.17, Transportation, and noise is considered in Section 3.12, Noise.







*Santa Ynez Band of Chumash Indians*  
*Tribal Elders' Council*

*P.O. Box 517 ♦ Santa Ynez ♦ CA ♦ 93460*

*Phone: (805)688-7997 ♦ Fax: (805)688-9578 ♦ Email: elders@santaynezchumash.org*

December 27, 2019

Southern California Association of Governments  
900 Wilshire Boulevard, Ste. 1700  
Los Angeles, CA 90017

Att.: Ping Chang, Manager

Re: Connect SoCal NOA of DEIR

Dear Mr.Chang:

Thank you for contacting the Tribal Elders' Council for the Santa Ynez Band of Chumash Indians in regards to the above mentioned project.

*At this time*, the Elders Council requests no further consultation on this project; however, if supplementary literature reveals additional information, or if the scope of the work changes, we kindly ask to be notified.

Thank you for remembering that at one time our ancestors walked this sacred land.

Sincerely Yours,

The Tribal Elders' Council Governing Board



**From:** Jessica Mauck  
**To:** ["chang@scag.ca.gov"](mailto:chang@scag.ca.gov)  
**Subject:** 2020 draft Connect SoCal PEIR  
**Date:** Monday, January 6, 2020 9:34:00 AM

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Hi Ping,

Thank you for contacting the San Manuel Band of Mission Indians (SMBMI) regarding the above referenced project. SMBMI appreciates the opportunity to review the project documentation, which was received by our Cultural Resources Management Department on 13 December 2019. SMBMI has no concerns or comments for your agency in regard to this project, except to note that the San Manuel Reservation is actually 1123.68 acres (as written in a letter supplied to the Tribe by the BIA in 2019). The 673 acres noted within the PEIR is a very old number – unfortunately, the BIA has not been able to retain regularly updated lists of reservation land for public use. While this is not necessarily a massive alteration for your document, I wanted to point out the correct number, just in case you felt it needed to be updated for the purpose of your study.

Thank you,





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

FED-1

January 23, 2020

Southern California Association of Governments  
Attn: Roland Ok, Senior Regional Planner  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

Subject: EPA Comments on the Connect SoCal 2020-2045 Regional Transportation  
Plan/Sustainable Communities Strategy and Programmatic Environmental Impact Report

Dear Mr. Ok:

The U.S. Environmental Protection Agency has reviewed the Southern California Association of Governments Connect SoCal 2020-2045 Draft Regional Transportation Plan/Sustainable Communities Strategy and Draft Programmatic Environmental Impact Report. The EPA supports SCAG's goals of incorporating environmental and community considerations in the regional transportation planning process. Early integration of comments from regulatory and resource agencies can result in greater opportunities to reduce environmental and public health impacts associated with future transportation projects. The EPA provides the below feedback following our limited review of plan elements related to goods movement, environmental justice, and air quality.

1

**Comments on the RTP/SCS**

**Goods Movement**

Consistent with previous SCAG RTPs, Connect SoCal emphasizes the need to deploy zero and near-zero emission technologies, with the ultimate goal of transitioning to ZE technologies, in order to reduce air quality impacts from the region's freight system. It also highlights the importance of providing necessary supportive infrastructure and considering lifecycle impacts associated with these technologies. Pages 60-67 of the Goods Movement Technical Report describe numerous local, state, and federal initiatives to advance clean freight technologies, such as the California Sustainable Freight Action Plan, the South Coast Air Quality Management District's proposed Facility-Based Mobile Source Measures, and the San Pedro Bay Ports' 2017 Clean Air Action Plan Update. Specific roles identified for SCAG and partner entities, described on pages 68-69, include convening stakeholders to discuss battery manufacturing and disposal, coordinating with partners to include charging and fueling infrastructure in regional projects, and securing funding for technology evaluation and demonstration. The EPA strongly supports the efforts to transition to a ZE/NZE goods movement network described in the RTP. Such efforts will be critical to reducing public health impacts associated with ambient air pollution and assisting the South Coast Air Basin in attaining National Ambient Air Quality Standards.

2

**Recommendation:** Consider incorporating robust ZE/NZE deployment strategies in any planned freight-related capacity-enhancing projects, particularly those that would be located near

sensitive receptors and/or in heavily burdened communities.

2

**Environmental Justice**

*EJ Toolbox*

The Environmental Justice Technical Report examines 18 performance indicators within four geographic scopes to thoroughly evaluate the RTP’s impact on EJ populations. The performance indicators are conveyed through four broader groups: impacts to quality of life, health and safety, commute, and transportation costs. Geographic scopes include the SCAG region, EJ Areas, Senate Bill 535 Disadvantaged Communities, and Communities of Concern. The report utilizes an array of data visualization methods, including maps that identify areas that have undergone significant changes over the years in relation to EJ communities and tables that convey how wildfire and flood risk vary by race and economic status. The findings of the report indicate that, for many performance indicators, the RTP would improve conditions for low-income and/or minority populations; however, it would also result in some disproportionate impacts to EJ communities, such as increases in emissions, noise, and rail impacts in certain areas. The EJ Toolbox included on pages 167-177 offers potential measures to address impacts to low-income and/or minority communities for various impact areas, including air quality, climate vulnerability, and noise.

3

**Recommendation:** Consider including the SCAG EJ Toolbox as a suggested resource in relevant project-level mitigation measures in the Final PEIR.

*Congestion Pricing*

The RTP incorporates three congestion pricing strategies, including the development and expansion of express lane networks, a proposal to establish a mileage-based user fee, and the use of Cordon/Area Pricing. As explained in the Environmental Justice Technical Report, the introduction of a mileage-based user fee could alleviate some disproportionate burden on low-income drivers because “it allows lower income households to pay the same price per mile as other groups, whereas the gasoline tax does not”; however, the report also acknowledges that a user-based fee would nonetheless be regressive in nature, as such fees would comprise a larger percentage of lower-income drivers’ incomes than for drivers of higher income groups (p. 165).

**Recommendations:**

- Consider including a discussion of potential methods to address any disproportionate impacts to low income drivers that could result from the proposed congestion pricing programs (e.g., subsidizing the purchase of required transponders, waiving monthly maintenance fees, allowing the use of cash to open and replenish toll accounts, etc).
- Include a detailed description of any equity assessments that have been completed for existing congestion pricing programs in the region. Describe the key findings of each study and any approaches taken to reduce disproportionate impacts to low-income motorists.
- Encourage partner agencies to conduct equity assessments for planned congestion pricing programs.

4

**Comments on the PEIR**

**Air Quality Mitigation Measures**

The mitigation measures included in the Connect SoCal PEIR are classified into two types: those that SCAG would commit to implement, and those that would be considered by implementing agencies during project-level planning. The EPA supports SCAG Mitigation Measures Air Quality-2 and AQ-3, which confirm SCAG’s continued commitment to evaluate public health outcomes through the transportation planning process, specifically through the Public Health Working Group, and to analyze air quality impacts, particularly in vulnerable communities, such as near-roadway communities. The EPA also supports SCAG’s interest in improving active transportation in disadvantaged communities as indicated in SMM-AQ-1. We suggest elaborating on this program in the Final PEIR.

**Recommendation:** Provide additional details about the proposed Southern California Disadvantaged Communities Planning Initiative described in SMM AQ-1, including the entities that would participate in the initiative, potential eligibility criteria for applicants, and the community engagement strategy that would be employed.

5

Project MM-AQ-1 describes an array of emissions controls that lead agencies would consider in order to reduce construction-related emissions, including fugitive dust controls, idling restrictions, and the use of Tier 4 equipment in projects within 500 feet of certain sensitive land uses.

**Recommendations:**

- Consider incorporating a goal to minimize community impacts in PMM-AQ-1(o).
- Consider encouraging the use of ZE/NZE technologies, where feasible and appropriate, in PMM-AQ-1(q).

**Greenhouse Gas Mitigation Measures**

We support the robust set of mitigation measures to address greenhouse gas emissions listed on pages 3.8-68 - 3.8-72, many of which would yield the co-benefit of reducing criteria pollutant emissions. Project-level measures for consideration include the incorporation of green building features (e.g., energy-efficient construction materials, installation of energy-efficient lighting systems, use of highly-reflectivity building materials), the use of Best Available Control Technologies during construction (e.g., lighter-colored pavement, planting of shade trees, deployment of ZE/NZE technologies), and measures to encourage bicycle and public transit use.

6

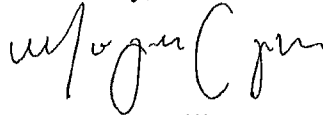
**Recommendation:** Encourage the consideration of measures included in PMM-GHG-1 in environmental justice communities.

The EPA appreciates the opportunity to provide feedback for consideration during the regional transportation planning process. We hope this feedback will lead to improved environmental and public

7

health outcomes. Please send a copy of the Final RTP/SCS and PEIR when they become available to this office at the address above (mail code TIP-2). If you have any questions, please contact me at 415-972-3504 or capilla.morgan@epa.gov.

Sincerely,



Morgan Capilla  
Environmental Review Branch

Electronic copy: Brenda Powell-Jones, Caltrans  
Jason Roach, Caltrans District 7  
Aaron Burton, Caltrans District 8  
Smita Deshpande, Caltrans District 12  
Lijin Sun, South Coast Air Quality Management District



**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7

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STA-1

*Making Conservation  
a California Way of Life.*

January 23, 2020

Mr. Kome Ajise  
Executive Director  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017

Dear Mr. Ajise:

The California Department of Transportation (Caltrans) wishes to thank the Southern California Association of Governments (SCAG) for the opportunity to review and comment on the Draft Connect SoCal, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Draft Program Environmental Impact Report (PEIR).

1

Caltrans applauds SCAG's use of innovative techniques and methodologies in engaging constituents within its six-county jurisdiction through its "Bottom-Up Local Input and Envisioning Process". Building upon the previous 2016 RTP/SCS, the Draft Connect SoCal plan boldly implements sustainable planning strategies aimed to increase active transportation plans and products, increase ridership and use of various forms of transit, improve the infrastructure of goods movement, reduce congestion and Vehicle Miles Traveled (VMT), and create more diverse and affordable housing; while reducing greenhouse gases and advancing healthy communities amongst other transformative efforts.

The Draft Connect SoCal plan was distributed to Caltrans' Headquarters and Districts 7 (Los Angeles and Ventura Counties), 8 (San Bernardino and Riverside Counties), 11 (Imperial County), and 12 (Orange County). The offices within each District and Division were given the opportunity to review and comment on the Draft RTP/SCS and Draft PEIR documents according to the California Regional Transportation Plan Guidelines.

2

Connect SoCal's core vision coupled with its goals and guiding principles helps to further an interconnect region. Moreover, SCAG's commitment to strengthen previous investments in our multi-modal transportation system and with focused direction for future plan investments results in increasing the region's overall resiliency, prosperity and competitiveness.

Specific comments on the Draft RTP/SCS chapters and appendices are included in Attachment A and specific comments on the PEIR are included in Attachment B.

Mr. Kome Ajise  
January 23, 2020  
Page 2

If you should have any questions in regard to the comments, please do not hesitate to contact Mine Struhl of my staff at (213) 897-0409.

2

Sincerely,



Paul Albert Marquez  
Deputy District Director for Planning

cc: John Bulinski, D7  
Ray Desselle, D8  
Ann Fox, D11  
Lan Zhou, D12  
Marlon Flournoy, DOTP  
Jacqueline Kars, ORP  
Caleb Brock, ORP

Attachments

Mr. Kome Ajise  
January 23, 2020  
Page 3

## Attachment A

### Caltrans Headquarters – Office of State Planning

- The introduction is clear and informative on the regulations that guide the RTP development process however, RTP's are also influenced by the policies leveraged by the State. Suggest including additional language on SB 391 (2009) which also requires the California Department of Transportation to prepare the California Transportation Plan (CTP), California's long-range transportation plan. Reference to the CTP would illustrate the interrelationship between regional and statewide transportation objectives – highlighting how major metropolitan areas, rural areas, and state agencies can coordinate planning efforts to achieve critical statewide goals. Consider the following:

“To better coordinate with the State, Connect SoCal was developed to align with The California Transportation Plan (CTP). The CTP is a long-range statewide level transportation plan that combines regional transportation and land-use plans to produce a unified multimodal strategy to achieve our collective vision of a lasting and well-integrated transportation system that benefits both people and goods over the next 25 years.”

- While the plan is visually appealing and easy to read, consider including discussion on other Caltrans modal plans where necessary. With regards to the transportation complexities that exist throughout the State, differentiating the statewide goals from local/regional needs helps emphasize the challenges associated with transportation targets set forth by the State. Doing so also highlights the strategies proposed within the Connect SoCal to address transportation shortfalls within the SCAG region.

3

### Caltrans Headquarters – Aviation & Aeronautics

- Land use and zoning around airports is an important element to consider and guidance can be found in the California Airport Land Use Planning Handbook (Handbook). Land use compatibility with an adopted general plan is the responsibility of each Airport Land Use Commission (ALUC). Airport Land Use Compatibility Plans should be regularly updated and reference current general plans to prevent incompatible land uses that encroach upon or threaten airport operations. Airports enable the movement of people and goods. They allow a community access to the nation's air transportation system. Airports are a valuable community resource enabling public services, such as medical transport and law enforcement. Future uses may include freight and package delivery as the use of Unmanned Aerial Systems (UAS) develops.
- Traffic congestion is one of the leading issues in transportation planning. The emerging concept urban air mobility (UAM) is expected to provide a new solution by making use of the three-dimensional airspace to transport passengers and goods in urban areas. Airport Shuttle and Air Taxi markets are viable markets. We are aware of Uber announcing Los

Mr. Kome Ajise  
 January 23, 2020  
 Page 4

Angeles as one of the first cities to offer Uber Air flights, with the goal of beginning demonstrator flights in 2020 and commercial operations in 2023. The City of Los Angeles is creating an aerial mobility network integrated with its other transportation systems and investments.

- UAM largely is dependent on vertical takeoff and landing (VTOL) operations in urban areas. UAM application is to build well-distributed infrastructures to support VTOL aircraft operations. Those infrastructures are heliports and vertiports (or sky ports), where VTOL aircrafts take off and land, onboard or disembark passengers, and get charged. The Federal Aviation Administration has Advisory Circular 150/5390-2C to provide guidance on permitting and siting heliports.
- Significant legal/regulatory, certification, permitting/licensing, infrastructure, and weather constraints exist for currently operating aircraft. Vertiport or heliport locations should be carefully reviewed with consideration of its impact on potential UAM demand, safety, environmental impacts, land uses, energy distribution and demand, and transportation system performance.
- Can SCAG's RTP/SCS draw from Air Cargo projections and congestion/demand management strategies to formulate planning for logistics impacts from the growing consumer demand for home deliveries?

Please note below the following Codes for implementation in the Aviation input into the SCAG Draft RTP and its Aviation Technical Appendix:

- PUBLIC UTILITIES CODE – PUC- - -
- DIVISION 9. AVIATION [21001 - 24451]
- (Division 9 added by Stats. 1953, Ch. 151)
- ARTICLE 3.5. Airport Land Use Commission [21670 - 21679.5]
- (Article 3.5 added by Stats. 1967, Ch. 852)
  
- SCAG also note: 21670.2.
- Sections 21670 and 21670.1 *[These are the sections that require ALUCs in any county with public-use airports—DOC]* do not apply to the County of Los Angeles. In that county, the county regional planning commission has the responsibility for coordinating the airport planning of public agencies within the county. In instances where impasses result relative to this planning, an appeal may be made to the county regional planning commission by any public agency involved. The action taken by the county regional planning commission on an appeal may be overruled by a four-fifths vote of the governing body of a public agency whose planning led to the appeal. <http://planning.lacounty.gov/aluc>
  
- And, to clarify, our Cal. Aviation System Plan (CASP) update is not for the 2016 Policy Element directly. We're following a required 5-year update cycle, but the Plan will embark on a new course without "elements;" instead aligning with CTP 2050 to assist inter-modal goals.

3

Mr. Kome Ajise  
January 23, 2020  
Page 5

### **Caltrans Headquarters – Office of Regional Planning**

The Office of Regional Planning (ORP) would like to commend SCAG for their vivid and creative approach to demonstrating SCAG's 20-year vision for the future.

Overall, the page references on the RTP Checklist included whole chapters and entire technical reports. We recommend that SCAG reference specific page numbers for each question on the RTP Checklist with their Final RTP submission.

Below are the following comments in reference to the RTP Checklist Contents:

#### General

- #2. The document identifies several strategies but does not delineate whether they are short-range and long-range strategies/actions (23 CFR 450.324(b)).
- #3. There is mention of the elements required throughout the report, but as a public document this checklist should reference more specific pages instead of whole chapters and technical reports. Also, the report doesn't have specific sections dedicated to each element i.e. policy, action, and financial (California Government Code Section 65080). These elements should be clearly defined and easily accessible by specific page numbers.
- #4(a). The referenced pages are missing the general location of uses and building intensities. (HQ referring to the page numbers that SCAG identified on the RTP Checklist. SCAG should ensure 4(a) of the RTP Checklist is fully addressed, specifically, the general location of uses and building intensities within the region).
- #4(b). There is a lot of information to decipher and it is not clear that SCAG identified areas within the region sufficient to house all the population of the region, including all economic segments of the population over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth.
- #4(h). SCAG identified one map on page 23 of their SCS Technical Report (HQ is referring only to the SCS. It seems that SCAG labeled all of their appendices with "Technical Report," but the specific requirement in RTP Checklist 4(h) refers to the SCS requirement). This does not set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the ARB.
- #7. The outdated RTP Checklist that SCAG provided did not include question 7. Please provide the appropriate page references with an updated checklist.

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#### Consultation/Cooperation

- #3. It is difficult to clearly determine that SCAG consulted with the appropriate State and local representatives including representatives from environmental and economic communities; airport; transit; freight during the preparation of the RTP (23 CFR 450.316(b)). Please identify the specific pages for reference.
- #4. Please ensure that the final plan includes reference that federal lands within its jurisdictional boundary involve the federal land management agencies during the preparation of the RTP (23 CFR 450.316(d)).
- #5. It is difficult to determine where the RTP specifies that the appropriate State and local agencies responsible for land use, natural resources, environmental protection, conservation and historic preservation were consulted (23 CFR 450.324(g)).
- #6. Please include specific page reference that the RTP includes a comparison with the California State Wildlife Action Plan and (if available) inventories of natural and historic resources (23 CFR 450.324(g)(1&2)).
- #15. It is not clear that the RTP will be adopted on the estimated date provided in writing to State Department of Housing and Community Development to determine the Regional Housing Need Allocation and planning period (start and end date) and align the local government housing element planning period (start and end date) and housing element adoption due date 18 months from RTP adoption date (Government Code 65588(e)(5)).

#### Programming/Operations

- The outdated RTP Checklist that SCAG provided did not include a *Programming/Operations Section*. Please provide the appropriate page references for each question on the updated checklist.

#### Financial

- #4. It is difficult to determine which projects are regionally significant. Please ensure that all regionally significant projects are identified (Government Code 65080(4)(A)).
- #9. In the Transportation Finance Technical Report neither TCMs or SIP is mentioned. Please ensure that the final RTP address the specific financial strategies required to ensure the identified TCMs from the SIP can be implemented (23 CFR part 450.324(f)(11)(vi)).

#### **Caltrans Headquarters – Office of Freight Planning**

Overall, much of the Plan, specifically the Goods Movement Technical Report, includes vague and broad statements that are either not supported directly by data, analysis, or supporting evidence, or are supported with indirect and loosely (at best) related data and analysis. When data is sourced, it is cited in a way that makes it impossible to fact-check it or replicate the analyses. The language is so broad and vague that the plan does not leave the reader with a

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clear understanding of how the system works. For example, each goods movement mode is independently discussed within its section, and the plan is missing a section (discussion) that ties together and analyzes all the freight modes for a true multimodal freight system. The Plan's structure, styles, multicolor headings are confusing to read and difficult to identify the section relationships (e.g., main and subsections). We have listed main comments below.

### **Draft Connect SoCal**

- Broad and a Vague Content with Limited Supporting Data and Analysis
- Page 74 through 82, A significant portion of the main body includes broad and sweeping claims with limited, if any supporting data and analysis.
- Page 81, Table 3.3, SCAG Region Airport Passenger Forecast for 2020–2045 (no citation)
- Significant portions of supporting data are either not cited or not properly cited. As a result, this data cannot be checked for accuracy, and the analysis cannot be replicated. For charts with multiple data sources, one cannot determine what source is attached to the data.
- Provide professional citations. For example, see page 78, Truck Bottleneck Relief Strategy and Industrial Warehouse & Distribution Centers
- Missing Significant Freight Information
- Chapter 4 is missing a discussion of National Highway Freight Program funding and the Trade Corridor Enhancement Program.

### **Goods Movement Technical Report (GDPR)**

The Goods Movement Technical Report contained very little technical information. We expected to find supporting data, analysis, and methodologies for planning the regional freight system. Instead, the information was only slightly more detailed than what we found within the main document. In fact, the GMTR included very little supporting evidence, and sources are not cited in a way that allowed the reader to fact-check or replicate the analysis.

- A section for Pipelines, a key and critical freight mode recognized by the U.S. Department of Transportation as well as the California Department of Transportation, is not included within this report. Include a Pipeline section with the other freight modal sections (e.g., Rail, Seaports, Airports, Highways)
- Significant portions of the main body and the GMTR include broad and sweeping claims with limited, if any supporting data and analysis. For example, there is no direct supporting data and evidence included in the e-commerce section. We see broad statements such as e-commerce has greatly increased, and that e-commerce has negatively impacted

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neighborhoods. However, we did not see any direct supporting evidence. We expected to see the number of increased trips related to e-commerce, but instead, we saw an increase in the dollars spent. This data does not support that there are more trips, as customers may be buying more expensive items or more items that are delivered on the same trip. Also, all forms of e-commerce a lump together. For example, Amazon purchases that are ordered online and delivered directly to the customer are combined with purchases that are ordered online at places like Target, Walmart, and Best Buy, where the customer can choose to pick up their purchase at the store. The store pick-up purchases are similar to the Sears Catalog (started in 1893) when customers ordered out of a catalog via the mail and picked up their purchases at Sears. We recommend separating the different types of "e-commerce" and addressing them individually.

- Page 5, First Paragraph: Define goods movement dependent jobs and provide examples for the industries
- Page 5, First Paragraph, "Jobs in goods movement dependent industries are generally well-paying, with annual average compensation in the construction, manufacturing, and wholesale trade sectors outpacing the average annual compensation for all regional industry sectors.": Support with specific data (not just averages) so that we can see the range in pay to the job. Using averages can greatly skew the results (e.g., low wage jobs offset by CEO salaries). Also, support with more data, including data sources (including reports, data tables) so that the analysis can be replicated.
- Page 6, Maintaining the Long-term Economic Completeness of the Region: Either provide useful information, data, and analysis or delete this section.
- Page 6, Promoting Local and Regional Job Creation and Retention: Provide supporting evidence and data. Provide the specific number of jobs that are created by the ports as well as the number of regional jobs created by "international trade activities." Define International trade activities. Also, link the infrastructure to the economy.
- Page 17, Distribution Centers, Warehousing and Transloading Facilities: This section includes unsupported statements and claims. Include supporting evidence and data, and professionally source and cite the data.
- Page 17, Consumer Base, "This growth in residents and income is expected to drive consumer spending and demand for goods, increasing pressure on the regional transportation network.": Support with evidence and data, and professionally cite the data source(s).
- Page 26, Highlight Area, Trade in the SCAG Region, First Paragraph: Define "current Administration" by giving its name. Also, is it regional, state, or federal?
- Most of the supporting data is either not cited or not properly cited. As a result, this data cannot be checked for accuracy, and the analysis cannot be replicated. For charts with



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multiple data sources, there is no way to determine what source is attached to the data. Provide professional citations. For example, when using the US Census data, include the Program (American Factfinder), the table (e.g., DP05), and the date(s) or when using the US DOT data, include the Program (FHWA), the report, table, website, and the date(s). This is important so that a reader can fact-check the data and replicate the analysis. Without this critical information, the reader must question the validity of the data and analysis. Examples include but are not limited to:

- Page 4, Table 1
- Page 7, Improving the Safety of Goods Movement Activities and Highlight Area: regional Goods Movement Workforce Development
- Page 14 Exhibit 3
- Page 15, Table 2, footnote 6, 7, and 8
- Page 16, Figure 1, Airports, International Land Ports-of Entrée
- Page 17 Distribution Centers, Warehousing and Transloading Facilities, and footnotes 10 and 11
- Pages 18 and 19, Highlight Area, Seaports and Regional Trade Flows, Figure 2, and footnote 13
- Pages 20 to 34, Figure 3 to Figure 19, Footnotes 14, 17,18, 19, 20, 21, 22,23, 25,26, 30 (FAF Version?), 31,32,33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47,48

### Miscellaneous Comments

- Page 3, What is Goods Movement? A pipeline, a key freight mode is missing from this section.
- Page 3, Broad Economic Benefits: As currently written, this section is not understandable. Consider rewriting this section to include a clear introduction, thesis statement, body paragraphs, a restatement of the thesis, and a conclusion.
- Page 3, Broad Economic Benefits - First Paragraph: Who uses "performance" as a proxy: Without a subject, the relevance of this statement is unclear. What is the difference between the performance of the logistics industry and the contributions of the five major industries? Why does SCAG consider contributions of the "five major industry sectors..." more closely associated? Why were the agriculture and service industries (e.g., repairpersons) not included?
- Page 3, Broad Economic Benefits, Second Paragraph: Clearly link this discussion within this paragraph to the introduction above. As it is currently written, it is unclear how the GRP/GDP are connected (or not) with the five major industrial sectors. Also, what is "this economic impact"? Define "this economic impact."
- Page 3, Broad Economic Benefits, Third Paragraph: Clearly link this discussion within this paragraph to the first, introduction paragraph. Are the "good movement dependent

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industries" the same as the "five major industry sectors"? If not, how are they different. What is the difference between a sector and an industry? A layperson and technical expert should be able to read this and understand. As this is currently written, neither can.

- Page 4, Table 1- Change in Average Annual Pay for Goods Movement Dependent Industries in the SCAG Region 2012-2016: The introduction sectors reference five sectors; this table includes seven sectors. Why?
- Page 5, First Paragraph: Define freight dependent jobs.
- Page 5, Regional Global Profile: Consider renaming this section the United States Global Profile as the narrative references the U.S. and not the SCAG region. Also, absent from this section is a discussion regarding the impacts of California's climate policies on So Ca Port's competitiveness with other U.S. and international ports.
- Page 5, Regional Global Profile - Second Paragraph: Consider rewriting this paragraph because it is confusing.
- Page 6, First Paragraph: Identify who expects them to grow and by how much? Support this statement with evidence.
- Page 6, Second Paragraph: Replace "recent" with a specific date and identify the specific shift(s) (e.g., percentages) and policies as well as the specific impacts of those shifts. It is not unusual for the federal reserve to adjust, so it is important that this statement is supported with evidence and a citation.
- Page 6, Goods Movement Vision: This vision is focused on freight movement; however, it should also focus on servicing the people (e.g., brings food and clothing to the people in the region). By focusing on throughput and other technical details, the basic needs that freight movement provides for are overlooked. It is helpful to plan for freight movement using a lens of what the region would look like without freight accessibility.
- Page 7, Increasing Freight and Passenger Mobility: Populate this section with useful information like specific strategies for improving goods movement and how the region is going to double rail volumes. Also, include the current freight performance by mode (or reference to a different section that contains that information) and what needs to be done to maintain that performance into the future.
- Page 7, Improving the Safety of Goods Movement Activities: Are there currently issues, if so, what are they?
- Page 7, Mitigating Environmental Impacts of Goods Movement Operations: Explain why and provide cited data, analysis, and evidence supporting this claim.

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- Page 7, Highlight Area: Regional Goods Movement Workforce Development, Second Paragraph, First Sentence: "Currently, the U.S. is nearing, or at, full employment": Provide properly cited data supporting this claim. Also, link this to the SCAG region.
- Page 9, First Paragraph: Define "dead-end-jobs."
- Page 9, Seaports First Paragraph: Footnote 2: The WSC is a group. Please include a specific source (interview, report) that is properly cited so that readers can find the documentation of this statement.
- Page 9, Seaports, "percent of all containers in the U.S. moving through the San Pedro Bay Ports.<sup>3</sup> Despite some recent modest shifts in container volumes to other U.S., Canadian and Mexican ports, the total container volume for the San Pedro Bay Ports is still expected to grow to over 34 million by 2045, a 120 percent ...": How was this analysis performed. What is the data source (including citation)? Model type, name, version?
- Page 9, Seaports, "35 percent of the San Pedro Bay Ports' total import-related traffic. The other 65 percent is assumed...": Did this data also come from footnote 3? If not, source the data, and provide a professional citation.
- Page 9, Seaports, Third Paragraph – "deconsolidation of the contents": Define for laypersons.
- Page 9, Seaports, Third Paragraph – "Transloading allows for the movement of increased amounts of goods while...": This statement may or may not be correct. For example, it may be that the region has gotten to the point that the transportation system is so congested that there is no capacity to support any more trips (freight or other) regardless of container. So, provide data, analysis, and supporting evidence for this claim as it relates to the current and future SCAG freight system.
- Page 10, Railroads, First Paragraph, First Sentence, "Critical to the growth": Demonstrate how BNSF and UP are critical to SCAG's growth. For example, what functions do they play in SCAG's economy? Support with professionally cited data and evidence.
- Page 12, Second Paragraph: Who reduced the number of times freight itself (?) was handled, how was the freight handled, and what is the base year for the speed, efficiency, damage, and security. What year was the performance assessment developed that measured these items and identified that the efficiency and speed increased, the damage was reduced, and security became greater? Was the same base year and performance year used for all six intermodal terminals? Did all terminals follow the same methodology and use the same data? Support with professionally cited data and analysis.
- Page 12, "In addition to these intermodal terminals, there are railyards that serve carload traffic of various types. UP has a large carload freight classification yard at West Colton (at

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the east end.”: Does this section capture all the rail yards that serve carload traffic of various types?

- Page 15, Airports, First Paragraph: It appears that multiple data sources and perhaps years were used to produce the number included in this section. With this said, there is a real concern that the analysis is comparing "apples with oranges" or that selective data was used.
- Page 16, Figure 1 Air Cargo Tonnage through SCAG Regional Airports 2000- 2018: It appears that this table was constructed based on a mix of data and analysis that is not consistent. I suspect that this is a comparison of apples and oranges. See my comments regarding the data sources.
- Page 17, Supply Chains and the SCAG Region: Consider rewriting this section so that a layperson can understand. For example, what are product demand forecasting and production planning?

## **Caltrans District 7 – Freight Planning**

### **Goods Movement Technical Report**

- Last mile Delivery—page 2. METRO sponsored a conference in this regard, and it was also a focus in conjunction with INUF Conference in 2019. A more extensive discussion was expected. Additionally, no discussion provided on “First mile.”
- Page 16 of 32—Exhibit 3:
  - The “SR-206” shield should be Interstate 215. (same comment on exhibit 6 on page 52 of 132)
  - The “SR-30” shield should be SR-210.
  - The “I-210” shield that is shown to the right of the juncture of SR-57 and 210 should be SR-210 (Interstate 210 becomes SR-210 at the junction with SR-57.
  - Recommend the “county lines” are shown in different color as they are very similar to the highways not identified as part of the “Primary Highway Freight System.”
  - What year is the USDOT source?
  - NOTE: To the extent above information occurs in other exhibits, this should be considered a global comment.
- East-West Corridor—page 51. There is no “project scope” information, and no reference to any project(s) in the list of projects.

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- Appendix 1 of 1—page 123. Although multiple footnotes are from 2019, the discussion provided does not seem to include the most current information related to POLA (and possibly POLB) in this regard.

### **Caltrans District 7 – System Planning**

- Page 34 - Exhibit 2.5 – There are lots of gradients in the LA/OC region; suggest doing a zoom box to show the land use breakdown in better detail.
- Page 40 - Figure 2.5/2.6 (and other graphs throughout) - Color choices for poor and good are very similar, which makes it hard to read tables quickly.
- Page 59: *Core Vision – Paragraph 1*: Fix-It First is commonly associated with the SHOPP program; suggest mentioning it here.
- *Planning for 2045* – typos in Line 1
- Page 69 - Active Transportation - “Walking and bicycling are accessible forms of transportation for people of all ages, abilities and socioeconomic backgrounds.” This is not technically for certain abilities. Line could be read as exclusionary.
- Page 77 – Express Lanes Table Line 3 - Los Angeles – I-405 – Add I-105 Express Lane (Should be add I-405 Express Lane?)
- Page 163 – Measure R – Measure R has no sunset as of Measure M’s approval.

3

### **Caltrans District 7 – Forecasting and Modeling**

#### **Draft Connect SoCal**

- The goal of maintaining and rehabilitating the existing system is a laudable goal. The goal, according to SB-1, is to have 98% of the state highway system in each county operating at *Good or Better* condition by 2045. Table 1 on page 9 gives 47.9% of the statewide interstate highway system operating at *Good* in 2017. The only data in the report on pavement condition suggests a 3.4% drop over 2017-2022. How does the region intend to achieve the statewide level of performance when the current trend is downward?

#### **Transit Technical Report**

- Over the past 30 years, the SCAG region has made an unprecedented investment in transit infrastructure. Between 2007 and 2017, however, transit ridership has gone down by 19%. The projected goal of 1.6 billion transit trips in 2045, reflecting a 245% increase in transit ridership since 2015, seems rosy.

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- A common perception that transit is for the underclass seems to be an element here, but it isn't addressed.
- Calling for diligence against encroaching gentrification and good intentions regarding economic and environmental equity do not seem to have been enough so far to establish housing opportunities for all income levels. Relying upon the market forces that generated the current inequities to somehow solve them seems unrealistic. Markets prefer building housing for the higher income.
- There is a claim that you will get there from here, but the battle to provide affordable housing in Southern California is being lost, as witnessed by the tented encampments throughout the region, as well as the collapse every 20 years or so of the housing markets in the Antelope Valley, Inland Empire and the Victor Valley during recessions.
- The details on the 2020 RTP/SCS Travel demand modeling efforts in this report are scant. On page 2 of the Transportation Modeling conformity appendix, reference to the model as an Activity Based Model, and mentions that it has met federal requirements, and has been through a peer review process, but there aren't other details to assess the modeling efforts.
- Express Lanes are an important component of SCAG's planning for the highway system. The 2016 RTP assumes very high participation of 3+ Person Carpools on the Express Lane System. Those values are not realistic and give inaccurate estimates of future express lane person throughput, revenues generated and so forth. What are the values being generated in the SCAG 2020 RTP/SCS assignment model?
- The configuration of the No Build Highway Network mostly includes projects that I expected to see. The major changes seem to lay in the land use/transportation system interface which is the appropriate, but don't appear substantive enough to generate the massive behavioral changes envisioned.
- The report notes only one very general impediment to telecommuting. Specifically, it notes that some jobs are simply not amenable to telecommuting. That is true enough, but it reflects almost no examination of any specific impediments to telecommuting, nor how to overcome them. Questions of exercising oversight, handling liability issues are not addressed let alone resolved. No reference to specific financial, legal or social impediments to expanded telecommuting is mentioned. Yet, SCAG expects 9.5% of Home-Work trips to be eliminated through telecommuting.

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### **Caltrans District 7 – LD-IGR/ Mass Transit**

- Add an Executive Summary (that's a few pages longer than the summary on page 5)

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- In light of SB 743, it seems the following percentages should be reversed:
- - 22.8% Decrease in time spent in traffic delay per capita
  - 4.2% Decrease in daily miles driven per capita

## **Caltrans District 7 – Regional Planning**

### **Draft Connect SoCal**

- Page 2, under 'Our Plan'; in this section, commend SCAG for acknowledging the continuous partnership with the State (Department of Transportation) in advocating for implementation and funding for California's Active Transportation Program, resulting in the passage of Senate Bill 1.
- Page 2, SCAG identifies the region's multi-family shares declining from their peak in 2015. However, figure 2.4 illustrates 2017 as the peak year.
- Page 32, 'Present & Future Challenges', this section identifies Technical Reports for Connect SoCal. This section should include a weblink to the Technical Reports for reference purposes.
- Page 8, under 'What is Connect SoCal; in this section, the first paragraph discusses the Plan charting a path toward a more mobile sustainable and prosperous region. This section should include a visual graphic illustrating the connection between the key components.
- Page 20, SCAG identifies the two counties with the largest population growth (Riverside & Los Angeles), however this section should include the population growth throughout the SCAG region, including and identifying counties with disadvantage communities.
- Page 32, under 'Present and Future Challenges'; This section should include a weblink to the Technical Reports so interested parties can more easily see *how* the highlighted issues mentioned below are directly addressed by this plan.
- Page 32-33, under 'Affordable Housing'; This section brings up hurdles such as land use zoning that can make the development process expensive. Perhaps it would be beneficial to include some brief verbiage about how our region's zoning policies generally compare to other areas.
- Page 37, under 'Transportation Safety'; In the last sentence, it does not seem relevant or noteworthy to mention that lower speed crashes translate to a higher pedestrian survival rate. Instead, the plan should elaborate on how we can plan our transportation system in a way that encourages safe speeds since it has established that 30% of collisions result in unsafe speeds.

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- Page 38, this section identifies the historic catastrophic events data, however this section should include the effects of the catastrophic events as they corollate to transportation security.
- Page 41, the paragraph regarding funding transportation would have been enhanced by having a graphic showing the existing gap between cost of transportation and available dollars.
- Page 47, this section addresses trends and emerging challenges which must be done to reduce greenhouse gas and meet target goals. Commend SCAG for incorporating this segment as part of Connect SoCal to address additional alternative approaches to address regional challenges.
- Page 66, Table 3.1; Where can interested parties find more information on the listed Transit Capital Projects?
- Page 74, this section identifies the Project List Technical Report of financially constrained and unconstrained lists of projects. This section should include a weblink to the Project List Technical Reports for accessible reference purposes.
- Page 128, under 'VMT Per Capita'; Should verbiage be added to explain why the State is shifting towards VMT as opposed to Level of Service (LOS)? It could tie in with the promotion of in-fill development, multi-modal transportation options, etc.
- Page 150, Commend SCAG for identifying a framework to continue regional partnerships. Together the efforts will address regional challenges and an attempt to meet goals that deem unpredictable.
- SCAG is applauded for explaining Connect SOCAL concept and its connection to the RTP and its long-range goals. SCAG also noted that cities and counties adopting the spirit of the RTP into planning measures for their areas could help their eligibility for future funding grants.
- SCAG did a great job on discussion of the myriad of components that makeup an RTP.
- Suggest making the Environmental Justice/ Public Health Technical Report maps available as interactive maps for the public to view impacts in their communities as well as for comparative analysis.
- We applaud SCAG for considering the importance of an aging population (65+) in the Plan; 1 out of 5 residents in the SCAG region will make up this demographic (Page 17, Connect SoCal Draft). They are more susceptible to impacts in the focus areas listed in the Public Health Technical Report than is the general population.



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- Suggest more transparency, inclusion of sources, and studies concerning metrics such as those used to forecast “growth” regarding the job-housing balance (Page 45, EJ Technical Report) and “best practices” for time-based shopping and job accessibility (Page 58, EJ Technical Report).

**Technical Reports (General)**

- Passenger Rail: How does the Passenger Rail Report integrate CTP 2040 and the California State Rail Plan 2018 with regards to goals, policies and strategies?
- Transit: How does the Transit Technical Report integrate CTP 2040 and the Caltrans 2017 Statewide Transit Strategic Plan with regards to goals, policies, strategies and recommendations?
- Goods Movement: How does the Goods Movement Technical Report integrate CTP 2040 and the California Freight Mobility Plan with regards to goals, policies, strategies and recommendations?
- Aviation and Airport Ground Access: How does the Aviation and Airport Ground Access Technical Report integrate CTP 2040 and the California Aviation System Plan Policy Element 2016 with regards to goals, policies, strategies and recommendations?
- Active Transportation: Caltrans applauds SCAG on its robust and comprehensive commitment to Active Transportation. Caltrans praises SCAG for its many referencing of State of California and Caltrans documents relating to active transportation. Excellent sourcing and listing of CTP 2040, California Bicycle and Pedestrian Plan, various Caltrans District Level Active Transportation Plans, Caltrans State Highway Safety Plan, Caltrans Complete Streets Element Toolbox Guidebook, etc.
- Highways and Arterials: How does the Highways and Arterials Technical Report integrate CTP 2040 and the 2015 Interregional Transportation Strategic Plan and its programmed projects in the Interregional Transportation Improvement Program (ITIP) with regards to purpose, policies and considerations?

3

**Performance Measures Technical Report**

- Page 30, The report states that Environmental Quality is measured in terms of criteria air pollutant and GHG emissions. The EPA sets NAAQS for six common criteria pollutants, however only four (transportation related) pollutants are monitored in the SCAG region. What percentage of the overall criteria air pollutants do the other two pollutants contribute?
- In addition to criteria pollutants, the EPA identifies 9 priority air toxic compounds with mobile sources known as Mobile Source Air Toxins (MSAT). The nine priority compounds are: 1,3 – butadiene, acetaldehyde, acrolein, benzene, diesel particulate matter (PM), ethylbenzene, formaldehyde, naphthalene, and polycyclic organic matter (POM) which have the potential

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for adverse health effects. The Performance Measures technical report has no mention of these mobile source air toxins. They should be monitored and strategies for reduction of MSAT be implemented.

- Non-SOV mode share is included in the Environmental Quality outcome category. Would be helpful to have figures that show percent of people who have switched to this method of transport and projections for future conversions to this method and its overall impact on emissions.
- Emissions are estimated using results of the SCAG RTDM which are then inputted to the California Air Resources Board (ARB) Emission Factors (EMFAC) model. Information on the accuracy, precision, and uncertainty values of the model would be helpful.
- Page 31 Differentiate between tropospheric ozone (ground/surface-level) which can have adverse health impacts on the community versus stratospheric ozone.
- Clearly define "reactive organic gases (ROG)" and identify which ones are the largest contributors to the formation of surface ozone levels in the SCAG area. Which reactive organic gases are being monitored?
- Ozone concentrations can reach unhealthy levels when the weather is hot and sunny with little or no wind. Tropospheric ozone formation is sunlight/temperature dependent. Report could use information on the effects that future climate change (possible increase in temperature) will have on tropospheric ozone production rates up to the year 2035. It is not clear if this change has been considered when running prediction models.
- Page 31 – Table 10, (SB 375) regional targets were updated by the Air Resources Board in 2018 to ensure consistency with the more stringent statewide reduction goals subsequently introduced by the California legislature and the Governor's office.
- SB 375 Regional Plan Climate Targets through Sept. 20, 2018 for 2020 were -8%, that goal remained the same after the more stringent goals were introduced beginning Oct. 1, 2018. Was this goal met? If so, what strategies were successful in reaching this goal?
- However, for the 2035 goal, the goal before Oct. 1, 2018 was -13% and was changed to -19%. The newly adjusted goal has been made significantly higher. How has this affected planning to meet the 2035 goal now that it has been changed substantially? Is it feasible?
- Page 32, What criteria and associated weights are used in the SCAG Scenario Planning Model (SPM)?
- There is mention that for Connect SoCal. The scenario modeling capabilities have been enhanced. By what methods and criteria?

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### **Transportation Conformity Analysis Technical Report**

- Page 3, State Implementation Plans (SIPs) - Connect SoCal must conform to the applicable SIPs [motor vehicle emissions budgets (for all criteria pollutant SIP's) and TCM's (for ozone and CO SIP's only)] in the SCAG region.
- Page 4, Federal Clean Air Act Designations in the SCAG Region - Differentiate between tropospheric and stratospheric ozone formation.
- Address the differences and severity between PM 10 and PM 2.5 health risks.
- It is crucial to provide information about the atmospheric lifetime of the criteria pollutants. Pollutants with long atmospheric lifetimes can survive in the environment for years which can greatly impact modeling efforts.
- Page 28 – end, Tables with ROG - Define Reactive Organic Gases/clarify if they are using the ARB definition along with its exemptions. (ROG usually means any compound of carbon) however the ARB has listed exemptions to ROG which would not be included in emission measurements. Alternatively, specify what compounds are being tested for/monitored and shown in the table under ROG.

### **Goods Movement Technical Report**

- Currently, much of the SCAG region fails to meet federal ozone and fine particulate air quality standards as mandated by the federal Clean Air Act.
- Although zero-emissions vehicles seem to be the goal, the discussion on near-term improvements that can be implemented sooner and at a cheaper cost is appreciated. Zero-emission vehicles for goods movement are still at an early stage and require a lot of money for implementation including the planning and building of new infrastructure to support the energy needs of these technologies.
- It is important to explore other emission reduction strategies that can be implemented right away with relatively lower costs. (e.g. improvements to engine efficiency. Increase efficiency in internal combustion engines through engine technologies such as waste heat recovery which lowers fuel use).

### **Caltrans District 7 - Active Transportation**

#### **Draft Connect SoCal**

- Page 54 - Livable Corridors Section:

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- This section focuses on BRT options to qualify an area as a “livable corridor”, but consideration should also be given to rail corridors as well.
  - There is no mention of landscaping, green scaping, shade trees or bioswales as a viable improvement for a livable corridor. These types of improvements can also help slow down traffic and improve the conditions for other street users.
- Page 69-70 - Active Transportation Section:
    - It would be helpful if the active transportation improvements section included more specific improvements (like the Transit Improvements section). Improvements to pedestrian facilities are important and should be noted.
    - There were many community concerns regarding the Venice Boulevard Great Streets project. We suggest using a much more successful example of a Great Street in this section.
    - More funding opportunities should be provided for community-based organizations to be “partners” or “co-leaders” with agencies to help ensure the community’s active transportation needs will be met.

**Active Transportation Technical Report**

- The terminology used in this technical report is not well explained or defined; please consider providing a Lexicon.
- We recommend providing more details on “green streets” and the value these offer towards a more sustainable future.
- Page 56 – Safety: The current safety goal (reduce traffic fatalities for all modes by three percent and serious injuries by 1.5 percent by 2050) is extremely conservative relative to the widespread adoption of “Vision Zero” at many federal, state and local agencies to reduce fatalities and serious injuries to zero.
- Page 59 - Pedestrian Infrastructure: Consider adding “reducing driveway conflicts” as part of Strategy 1 or 3 to reduce potential conflicts between pedestrians and drivers.
- Page 59 - Local Bikeway Infrastructure: Specify the types of “low-stress protected bikeway networks” facilities described in Strategy 1 that are preferred (e.g., Class I, II, III, or IV)
- Page 60 - First-Last Mile Infrastructure / SRTS Infrastructure: All policies should include an equity strategy to ensure future investments are going towards improving previously disinvested communities to increase safety for vulnerable road users.
- Page 64 - Safety Strategies: Consider historically disproportionate impact that increased enforcement/ policing has had on low-income communities of color in Safety Strategy 3 and

3

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Strategy 7. Enforcement should be tempered with appropriate, ongoing public engagement to avoid potential alienation and discrimination in these communities.

### **Caltrans District 7 – Division of Design**

- The plan “sounds good” and at the same time very unrealistic.
- Assume reduction in car usages and VMTs, mainly thru “Transit Integration”. While in the past 10 to 12 years Transit Ridership has been decreasing in the region and nationwide.
- The use of this Plan/Strategy’s numbers will hide/lessen the impacts of Goods Movements mobility projects, Tolling Lanes with assumed future Demand, etc., and boasts the assumed benefits identified below (Region’s assumptions). See Regions unsupported/overestimated assumptions below (pushed as future “facts”).
  - SCAG’s region projected 19%, or 3.7 Million population increase in the Region over the next 25 years. This projection is likely to be low, if California’s economy maintains its strength.
  - According LA based Beacon Economics in the next 30 years, LA County would increase by 3.5 million and Riverside County will increase ~ 3.2 million.
  - <https://www.reuters.com/article/us-california-population/californias-population-to-hit-60-million-by-2050-idUSN0930091220070709>
- MODE SHIFT: The assumptions are based to a large degree upon the extent to which major mode shifts within the region can be accomplished. No reasonable and/or quantifiable data provided on that insures these shifts are highly probable to materialize, especially as transit ridership has been steadily declining in the past 12 years nationwide and throughout Southern California. With Technology leaps, driverless car sharing options are likely to lead to increases in vehicle miles traveled (VMT).
- The same with all past Plans, this Mobility Plan promises to “fix” the current challenges... With No Accountability, only to repeat in the next one while consuming Billions of tax dollars, which is very good for the economy.
- HIGH OCCUPANCY VEHICLE (HOV) AND TOLLING LANES: It is crucial to transparently address Inequity issues (Title VI, etc.), address the true Corridors’ mobilities prior to regional policies to increase the number of persons needed to ride for free in Tolling lanes. Need comprehensive and transparent impacts assessment on traffic congestion and on people impacted by these changes. Currently designed Tolling “Express” Lanes policy papers is skewed towards Tolling (“drives” the operational assessment). The operations should be based on, at a minimum, evaluating all freeway lanes together (included tolling). To be transparent, the operational analysis should address the Corridor (to include parallel arterials/local streets impacts).

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*A recent example from Metro's I-105, EA 314500 PAED docs., Convert HOV lane and add a lane (for a 2-Tolling Lanes): The 2016 SCAG RTP/Sustainable Communities Strategy (scenarios include: Transit Integration, Livable Corridors, "Neighborhood Mobility Area" - walking/bicycling, Bike and car sharing, etc.). The Travel Demand Model year (2047) shows 17.2 % trip reduction (traffic #s lower than current counts). Metro/" PDT" said this was not a realistic forecast and implemented a strategy that translates into higher vehicle on the I-105 GP and Tolling lanes). Metro selected to use year (2027) TDM projections/congested #s, project opening year, and held these #s constant thru year (2047)! This Strategy justifies implementing the Tolling Project. At the same time to reduce the schedule and cost, it was argued that the Fwy Traffic Noise impacts would be much lower with reduced traffic demand, therefore no need to construct sound walls.*

### **Caltrans District 8**

Thank you for the opportunity to review Connect SOCAL the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. We found the overall document to be generally well written, visually interesting to read and provided the results and finding on an array of regional planning issues from a lot of work that clearly took years of sustained, focused, directed effort.

It is our understanding that the United States currently faces a housing shortage in excess of some 7 million dwelling units. Of that 7 million+ dwelling unit shortage some 3.5 million units of the shortfall exists here in California. Beyond homelessness and increased use of limited existing square footage in our existing housing supply, the unprecedented housing shortage has created a range of social equity issues (lack of personal financial independence, homeownership etc.).

Since some 73 percent of Californians live in Southern California, the housing shortage is an extremely important issue with a range of impacts on the transportation system. The 2012 RHNA indicate a need for 412,000 new housing units. The 2018 RHNA indicates a need for some 1,340,000 million new housing units in Southern California. The draft Connect SOCAL document doesn't seem to indicate what the extent of this worsening crisis is here in Southern California.

As noted in the summary of Connect SOCAL the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, the current severe housing shortage creates jobs/housing balance issues and the need for longer commutes and increased congestion on the overall transportation system.

On Pages 48-56 under the heading Sustainable Communities Strategies and Housing Supportive Infrastructure Connect SOCAL discusses sustainable development practices such as Center Focused Placemaking, Priority Growth Areas, Job Centers Transit Priority Areas, High Quality Transit Areas and Neighborhood Mobility Areas and discusses the housing crisis

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but provides little indication that the types of desired development listed above is happening on a large scale in the region.

Page 49 included a short list of ways Diverse Housing Choices could be encouraged. We commented in bold below on these strategies and recommended additional strategies related to housing and transportation caused by longer commutes and increased congestion caused by new housing.

- 1) Preserve and rehabilitate housing and prevent displacement. **Wouldn't preservation/rehabilitation occur due to supply and demand? Is displacement good if higher density is proposed?**
- 2) Identify opportunities for new workforce and affordable housing development. **Not really clear what this means? Do you mean Affordable housing for new members of the workforce?**
- 3) Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply. **Would this be expected to create hundreds of thousands of new units.**
- 4) Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions. **List ways to do this.**

Suggest policy support and reworking the Diverse Housing Choices section of the plan to include support of ideas like the following:

Support and reference The Ahwahnee Principles. <https://www.lgc.org/who-we-are/ahwahnee/principles/>

Support long lasting smart mobility decisions that improve the environment, create a vibrant economy and build communities not sprawl.

Support redevelopment of high density residential along transit served corridors.

Support having new housing be originally built with an accessory dwelling unit.

Support an overall trend to reduce of lot size minimums in the region by 20%.

Support the concept of building to the maximum density allowed in a residential zoning district rather to the minimum density.

Support a policy that wherever possible in all new specific plans placement of high density housing residential shall occur near planned schools, employment and retail areas.

Support a regional mode shift to walking and bicycling <https://dot.ca.gov/-/media/dot-media/programs/sustainability/documents/caltrans-strategic-mgmt-plan-033015-a11y.pdf>

Support the provision of designated areas for employment (beyond a few retail commercial and school sites) in all new specific plans.

Support the provision of connected street grid system by limiting cul-de-sac length to no more than 250 feet.

Support minimizing the size of a block, through the use of a block size maximum of 1,600 feet.

Support bike and pedestrian through block connectivity through subdivisions by providing one such connection every 600 feet.

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Support allowing 100 percent housing on vacant or abandoned property zoned for commercial retail use to help the viability of existing commercial uses (25 solutions article below).  
Support local jurisdictions efforts to provide a temporary 30% reduction on all residential impact fees for (3 -5 years) to encourage housing production.  
Support housing policy that provides net zero energy use that would build on the 1 million solar homes California has with a goal of greatly increasing this total (roughly 12.5 million dwelling units exist with a need for 3.5 million more dwelling units)  
Support allowing a reduction in setback standards to Uniform Building Code minimums on side yards and limit front and rear yard setbacks to no more than 10 feet.  
Support the elimination for any required covered off street parking to support development of more housing units.  
Support development of high density housing in unused portions of commercial shopping centers/office etc. parking lot areas.  
Support allowing a reduction in local public street width standards and/or to allow reduced width private streets to encourage infill development.  
Support increasing residential building height standards in residential zoning districts to allow greater building square footage.  
Support any regional efforts to develop the missing middle housing of the past few decades.  
<https://missingmiddlehousing.com/>

In the Measuring our Progress portion of Connect SOCAL Pages 118-147 it seems reasonable to assume that much of the "progress" in congestion relief and other areas has to do with 91,000 people per year leaving the SCAG region due to the high cost of housing and other reasons since 2014 as noted on Page 16 of Connect SOCAL discussion on mega trends. Is this real progress or an abandonment trend that needs to be reversed?

<https://www.worldpropertyjournal.com/real-estate-news/united-states/washington-dc-real-estate-news/up-for-growth-national-coalition-econorthwest-holland-government-affairs-housing-underproduction-in-the-us-2018-housing-shortage-data-10842.php>

<https://www.curbed.com/2019/5/15/18617763/affordable-housing-policy-rent-real-estate-apartment>

[https://ucreconomicforecast.org/wp-content/uploads/2019/04/SCAG\\_Housing\\_White\\_Paper\\_Digital\\_4\\_11\\_2019\\_Revise.pdf](https://ucreconomicforecast.org/wp-content/uploads/2019/04/SCAG_Housing_White_Paper_Digital_4_11_2019_Revise.pdf)

<https://urbanize.la/post/25-solutions-builder%E2%80%99s-perspective-fix-california-housing-crisis>



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## **Caltrans District 11**

### **Draft Connect SoCal**

- Truck Parking/Truck driver shortage: Please address and include truck parking needs in the SCAG region. In addition, the shortage of truck drivers is commonly cited as the number one problem in the trucking industry.
- Freight Projects List: Please include transportation projects that have been identified in the *2014 California-Baja California Border Master Plan* and the *Draft 2020 California Freight Mobility Plan*. Examples of projects that are missing in the Goods Movement Project List are: Forrester Road, Commercial Vehicle Inspection Facility modernization project at Calexico East Port of Entry (POE), bridge and highway realignment to Andrade POE, widen State Route 98 (SR-98) between Dogwood Road and V.V. Williams Ave., widen SR-98 between Ollie Ave. and Rockwood Dr., widen Menvielle Road to four lanes from Carr Road to SR-98, implement Border Wait Times System, and modernize existing truck parking/staging areas for near-zero to zero emission infrastructure truck shore power.
- National Freight Highway Network (NFHN): Please include and identify routes that have been designated as Critical Urban Freight Corridors and Critical Rural Freight Corridors. These are public roads in urbanized and rural areas which provide access and connection to the Primary Highway Freight System and the Interstate with other ports, public transportation facilities, or other intermodal transportation facilities.
- California Sustainable Freight Action Plan (CSFAP): Please describe how the RTP supports the goals and vision of the CSFAP. This State plan provides a vision for California's transition to a more efficient, more economically competitive, and less polluting freight transport system. Please include the Advanced Technology Corridors at Border POEs CSFAP pilot project as part of the RTP Goods Movement Environmental Conditions and Technology Advancement Strategies.
- Agriculture and Mining: Little is discussed regarding needs and availability of producing agricultural and mining (e.g., aggregate) commodities among border or rural areas of the region (Imperial and Coachella Valleys, Ventura, etc.). Safety, maintenance and asset management (e.g., State Highway Operation and Protection Program [SHOPP]) needs could be mentioned on lower-volume/seasonal routes impacted by heavy machinery movements/emissions.

### **Technical Reports**

- Highways and Arterials Technical Report Page 8 references SB1 in the context of performance measures and Page 14 mentions the Proposition 1B Corridor Mobility Improvement Account (CMIA) requirements for Corridor System Management Plans (CSMP) and components of those documents. SB1s requirement of corridor plans is not addressed nor are the competitive programs such as Solutions for Congested Corridors

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Program (SCCP), Trade Corridor Enhancement Program (TCEP) and Local Partnerships. Although not impactful for the California Environmental Quality Act (CEQA), the discussion is important for future funding opportunities and possible planning efforts.

- Page 10, Transportation Safety & Security: Table 3 - Is Fatality and Injury prediction table approved by Caltrans?
- Table 1 – FTIP Projects – FTIP ID Number IMP140804: Route should be “8”, not “999”.
- Table 2 – Project Number IMP0042A: The Demo funds identified for this project have been repurposed to a different phase for SR98. As such, this project should be removed.
- Additional project: Please add: SR186 All American Canal Bridge – Replace bridge to accommodate two vehicle lanes, shoulders and pedestrian/bicyclist facilities. Cost \$40M; Construction Year 2027.
- Transit: There are no comments related to any specific projects; however, the District would like to recommend that consideration be given to include bicycle and pedestrian facility connections and protection by enhancing visibility of bicyclists and pedestrians as well as to provide wayfinding signage to guide the active transportation population to facilities to help them complete their trip.

## **Caltrans District 12**

### **Draft Connect SoCal**

- The Draft Connect SoCal Plan provides long term guidelines and strategies for the SCAG region. These guidelines and strategies should align with State goals as laid out in State planning documents such as the California Transportation Plan (CTP), California State Rail Plan, California Freight Mobility Plan (CFMP), California Aviation System Plan (CASP), and State Bicycle and Pedestrian Plan. As stated in our previous comment letter during the Notice of Preparation (NOP) process, dated February 22, 2019, we encourage the incorporation of State planning documents to align the 2020-2045 RTP/SCS with State goals.
- The SCAG region has many highly urbanized areas that have increasing traffic demand due to population growth and economic development and have limited available Right-of-Way (ROW) for transportation purposes. To enhance the operability of current facilities, strategies such as Managed Lanes would provide efficient usage of current capacity, improve travel times, reduce vehicle miles traveled (VMT), provide alternative means of transportation and may provide revenue for other transportation improvements. These strategies are consistent with state, regional and local goals and objectives. As stated in comment 10 of our previous comment letter, the Department requests SCAG review and incorporate the Orange County Managed Lanes Feasibility Study (MLFS) and the Orange

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County Managed Lanes Network Study (MLNS) in the 2020-2045 RTP/SCS. The recommendations from these studies have not been included in the 2020-2045 RTP/SCS. These studies and the proposed projects, including District 12's I-5 Managed Lanes Project, reflect SCAG's Goals and Guiding Principles found on pages 9 and 10 by placing a high priority on improving mobility and reliability. The Department requests that District 12's I-5 Managed Lanes Project, for the project approval and environmental document (PA/ED) component, be included in the final 2020-2045 RTP/SCS and also amended to the 2019 FTIP, per our October 2019 request to Orange County Transportation Authority (OCTA).

- Climate change impacts have become a major concern for planning agencies at all levels. As required by California Senate Bill 379, many regional and local planning agencies have started developing plans to address climate change issues. While the 2020-2045 RTP/SCS includes climate change considerations in multiple sections of the document, it should incorporate climate change plans from other agencies into the document. Further clarification should also be provided to establish which plans supersede. As requested in our previous comment letter, please review the Vulnerability Assessment for Orange County and coordinate with Caltrans for future implementation.
- Caltrans District 12 appreciates the robust and thorough discussion in the RTP's Active Transportation Technical Report and supports SCAG's efforts in encouraging Complete Streets. This technical report aligns with Caltrans' goals and objectives. Complete Streets infrastructure benefits all roadway users and promotes mobility, equity, accessibility and regional connectivity, all while decreasing congestion and improving air quality.

### Active Transportation Technical Report

The following areas of the Active Transportation technical report that accompany the 2020-2045 RTP/SCS require consideration for revision:

- Page 3, first paragraph: under Section "Defining Active Transportation", add walking as part of the examples.
- Page 3, paragraph eight: consider making a distinction between traditional active transportation modes and micro-mobility modes.
- Page 5, Table 1 second row, second column: consider adding increased connectivity as part of the impacts.
- Page 7, paragraph eight: under Regional Significance consider discussing ADA-friendly infrastructure in one of the subsections. Active Transportation infrastructure also benefits ADA-reliant users by increasing these users' mobility and accessibility.
- Page 19, paragraph 4: verify the list of cities that currently have bike share programs. Some of the cities listed may no longer have these programs available. For example, the cities of

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Bellflower and Paramount had a partnership with dockless bikeshare company Ofo in 2017. However, Ofo has since backed out of the United States market.

- Page 79 and 85, Bicycle Master Plans, and Pedestrian Master Plans: the City of Irvine is currently developing an Active Transportation Plan and the City of Santa Ana has recently finalized its Active Transportation Plan. Additionally, the Orange County Transportation Authority has bikeway studies on four sub-areas of Orange County--North, West/Central, South and Foothills.
- Page 98, second paragraph and page 99 Exhibit 13: clarify that the City's protected bike lane along Bristol Street is a class IV facility and incorporate it into Exhibit 13.
- Southern California ports are seeing increased demand as trade with the Pacific Region continues to grow. SCAG should continue to plan for increased truck traffic within the region. Additionally, consider a discussion of the lack of available safe, secure and accessible parking for long distance freight vehicles. Projected growth of truck traffic and the demand for truck parking will continue to outpace the supply of public and private parking facilities.
- Due to the high number of residential developments, related functions such as micro-transit and micro-freight, need to be analyzed. Optimizing curb space locations and micro-freight and micro-transit routes may reduce congestion, VMT, and wait times for users. Additional multi-modal transportation options such as bus rapid transit and parallel light rail provide alternative options for travelers.
- The Department supports SCAG's efforts to create an integrated transit payment system, discussed in the Shared Mobility and Mobility as a Service section. Please coordinate with Caltrans since we are currently developing a similar statewide program. These efforts may improve the accessibility and affordability of transit services which may result in reduced emissions, VMT and congestion.
- Consider incorporating discussion of policies of various agencies to promote existing and future Park and Ride lots that may increase carpooling, bicycling and transit use as options for commuters. This would reduce VMT and congestion.
- Due to ROW constraints on the State Highway System (SHS), implementing Intelligent Transportation Systems strategies, as discussed in the core vision of the 2020-2045 RTP/SCS, would allow for enhanced capabilities to protect transportation systems and shorten response times, enhancing operations of the SHS.
- Review of the Project List has highlighted the following inconsistencies:
  - Project FTIP ID – ORA000820 – SR 57 Truck Climbing has a total Cost of \$164.2 million
  - Project FTIP ID – ORA131301 – SR 55 Add 1 Mixed Flow Lane from I-5 to SR 91 has a total Cost of \$151.1 million

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- Project FTIP ID – ORA131303 – SR 57 Orangewood to Katella has a total Cost of \$70.6 million
- Project FTIP ID – ORA131304 – I-405 Add 1 Mixed Flow Lane from I-5 to SR 55 has a total Cost of \$176 million

## Attachment B

### Caltrans District 7 – Environmental Planning

- |  |    |
|--|----|
| <ul style="list-style-type: none"> <li>• Footnote 75: the hyperlink to the Induced Travel Calculator may need to be corrected by simply removing “on October 25” from the clickable hyperlink. The hyperlink currently includes the phrase “on October 25” when clicked.</li> </ul>  | 4  |
| <ul style="list-style-type: none"> <li>• Page 3.17-8, Regional High-Occupancy Vehicle (HOV) System and Park and Ride System: please clarify if the HOV system described in this section includes the High Occupancy Toll (HOT) / express lanes. General information on the HOT lanes in the SCAG region (Los Angeles County in particular) and how HOT/Express and HOV lanes differ may be useful for this section.</li> </ul> | 5  |
| <ul style="list-style-type: none"> <li>• Wildlife Crossing: Besides the Liberty Canyon Wildlife Crossing that connects the Santa Monica Mountains to the open space of Simi Hills and Santa Susana Mountains, there is another opportunity for a different Wildlife Crossing at Conejo Grade around Camarillo and Thousand Oaks that needs to be looked at.</li> </ul>   | 6  |
| <ul style="list-style-type: none"> <li>• SCAG, Metro, and Caltrans should fund projects that will improve culverts for wildlife usage, especially in the rural areas of Ventura County.</li> </ul>   | 7  |
| <ul style="list-style-type: none"> <li>• There is also opportunity for wildlife crossings, connectivity, and corridor improvements on State Route 2 and Interstate 210 around La Cañada Flintridge, State Route 118, and State Route 126 around the Moorpark and Filmore area.</li> </ul>  | 8  |
| <ul style="list-style-type: none"> <li>• Rocky Peak on State Route 118 needs fencing and habitat connectivity including corridor improvements for wildlife.</li> </ul>   | 9  |
| <ul style="list-style-type: none"> <li>• Areas along Interstate 5 and State Route 14 at Sylmar, Granada Hills and north of Santa Clarita need open space to be connected (habitat connectivity) for wildlife movement.</li> </ul>  | 10 |
| <ul style="list-style-type: none"> <li>• Access to public parks and open spaces need to be improved. Special buses at discount rate (to take people from inner-city to these parks) will be very helpful to inner-city parents and families since many inner-city neighborhoods are far from parks that have interesting resources.</li> </ul>   | 11 |
| <ul style="list-style-type: none"> <li>• Besides light-rails and all proposed transportation projects, governmental agencies within Downtown Los Angeles and other large cities should consider alternative working hours and equip their staff to telecommute 3-4 times a month. This will improve lives and air quality.</li> </ul>  | 12 |
| <ul style="list-style-type: none"> <li>• Cal-Fire should have fire continues education for areas in the cities that borders open spaces. Training should be giving to volunteers and people who are willing to assist Fire</li> </ul>  | 13 |

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Officers and crew. We strongly encourage utility companies to place their utilities line underground (buried) in areas that are prone to wildfires.

13

- We believe some cities within SCAG's Region collects rainwater and run-off water. Since the average annual rainfall is between 12-22 inches, SCAG should encourage cities to capture rainwater, treat it and release it to our dry ravines.

14

**END OF CALTRANS COMMENT LETTER**





January 23, 2020

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Kome Ajise  
Executive Director  
Southern California Association of Governments (SCAG)  
900 Wilshire Blvd, Suite 1700  
Los Angeles, CA 90017

Dear Mr. Ajise:

The California High-Speed Rail Authority (Authority) received the Public Notice of Availability letters from SCAG for the Connect SoCal Draft Plan and the Connect SoCal Draft Program Environmental Impact Report (PEIR), dated November 14, 2019 and December 9, 2019 respectively. Connect SoCal is SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the Southern California region, covering the timeframe from 2020 to 2045.

The Authority has reviewed both the Connect SoCal Draft Plan and the Connect SoCal Draft PEIR, and respectfully provides SCAG with the following comments:

- Draft Plan, page 69: The Authority will release its Draft 2020 Business Plan in February 2020 for public review and comment. Final adoption of the 2020 Business Plan is expected at CHSRA's April 2020 Board meeting, for submittal to the State Legislature by May 1, 2020.
- Draft Plan, page 69: The Authority has not yet executed a Proposition 1A funding agreement with Los Angeles Metro for the LINK US project. The Authority, Metro, and the California State Transportation Agency (CalSTA) did execute a Memorandum of Understanding (MOU) in September 2019 which established a commitment for these agencies to work together cooperatively towards taking the necessary steps for this funding agreement to be established.
- Draft Plan, Passenger Rail Technical Report, page 13: The Authority 2018 Business Plan does include discussion of the Phase 2 system from Los Angeles to San Diego.
- Draft Plan, Passenger Rail Technical Report, page 14: Current schedules for the Authority's Southern California sections are as follows:
  - Bakersfield to Palmdale – Draft EIR/EIS documents are expected in early 2020, and Final EIR/EIS documents are expected in 2021.
  - Palmdale to Burbank – Draft EIR/EIS documents are expected in 2020, and Final EIR/EIS documents are expected in 2021.

- Burbank to Los Angeles – Draft EIR/EIS documents are expected in early 2020, and Final EIR/EIS documents are expected in 2021.
- Los Angeles to Anaheim – Draft EIR/EIS documents are expected in 2020, and Final EIR/EIS documents are expected in 2021.
- Draft Plan, Passenger Rail Technical Report, page 31: Same comment as the Draft RTP/SCS, page 69 regarding the LINK US project.
- Draft Plan, Passenger Rail Technical Report, page 34: There is no high-speed rail station planned in Sylmar.
- Draft Plan, Passenger Rail Technical Report, page 42: Same comment as the Draft RTP/SCS, Passenger Rail Technical Report, page 13 regarding the HSR Phase 2 system. Also, remove Madera and replace with Merced.
- Draft Plan, Project List Technical Report, page 128: The projected cost to complete California High-Speed Rail Phase 1 – ENV/PE is \$332 million for the Southern California project sections. This is consistent with the CHSRA 2019 Project Update Report (PUR), released in May 2019. COMPLETION YEAR – 2021, not 2017.
- Draft Plan, Project List Technical Report, page 242: The projected cost to complete the California High-Speed Rail Phase 1 system is \$38.96 billion for the Southern California project sections. This is consistent with the Authority 2018 Business Plan Capital Cost Basis of Estimate Report, released in June 2018.
- Draft Plan, Project List Technical Report, page 242: California High-Speed Rail Phase 2 – ENV/PE can be removed from the financially constrained RTP/SCS project list.
- Draft PEIR, Financially-Constrained RTP/SCS Projects, page 128: Same comment as the Draft RTP/SCS, Project List Technical Report, page 128. In addition, the Completion Year should be changed from 2017 to 2021.
- Draft PEIR, Financially-Constrained RTP/SCS Projects, page 243: Same two comments as the Draft RTP/SCS, Project List Technical Report, page 242.

In addition, we want to highlight related work that the Authority and SCAG have done in partnership with the City of Palmdale and the City of Burbank to help fund Station Area Planning efforts that will result in infrastructure and land use changes near future HSR stations and existing Metrolink stations, including the Palmdale Transit Area Specific Plan, and the Burbank Golden State Specific Plan. Both these efforts are ongoing and are related to Connect SoCal.

2

3

4

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STA-2

Thank you for your consideration of these comments. If you have any questions, please contact me by e-mail at [Margaret.Cederoth@hsr.ca.gov](mailto:Margaret.Cederoth@hsr.ca.gov) or by phone at (916) 669-6565.

5

Sincerely,



Margaret (Meg) Cederoth  
Director of Planning and Sustainability  
California High-Speed Rail Authority

Cc: Noopur Jain, Ben Lichty





Barry A. Rondinella  
A.A.E./C.A.E.  
Airport Director

REG-1

January 23, 2020

Draft Program EIR Comments - Connect SoCal 2020-2045 RTP/SCS  
Attn: Roland Ok, Senior Regional Planner  
Southern California Association of Governments  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

Dear Mr. Ok:

John Wayne Airport/Orange County (JWA) appreciates the opportunity to review and comment on the Southern California Association of Governments (SCAG) Draft Program EIR for Connect SoCal 2020-2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). During the EIR preparation process, SCAG requested, and JWA submitted, specific aviation-related data for use in preparing the document. The data that JWA submitted to SCAG included, but was not limited to, JWA's legal agreement parameters including operational and capacity limits; current passenger, aircraft and cargo statistics; recent aviation forecast information; and JWA's most recent Economic Impact Study.

1

In reviewing the Aviation Appendix, the information regarding John Wayne Airport is generally accurate and consistent with the information we provided. We would like to suggest the following minor changes to Appendix 3.13 Draft Airport Noise Overview.

1. We suggest that the John Wayne Airport "location" section on page 12, be revised as follows: "There ~~is~~ are residential land uses interspersed among the commercial uses with single-family and multi-family land uses .25 miles south west of the runway. ~~and~~ There are also residential land uses (single family and multi-family) ~~beyond the commercial land use~~ approximately .75 miles to the north, .5 miles to the west, and one mile to the east. ~~and approximately .25 miles to the south.~~ Figure 6, John Wayne Airport Location, illustrates the airport relationship to these land uses."

2

Please note that Figure 6 does not show the location of the residential uses.

Figure 8 shows the residential uses south of the airport, but not to the west, north or east.

3160 Airway Avenue  
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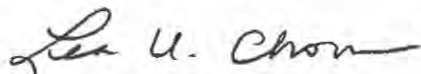
2. Page 15, "Existing Conditions" should also be revised to be consistent with the comment above.

3

Thank you for the opportunity to comment on the Draft PEIR for the 2020 SCAG Regional Transportation Plan/Sustainable Communities Strategy. Please contact me with any questions at (949) 252-5123 or [lchoum@ocair.com](mailto:lchoum@ocair.com).

4

Sincerely,



Lea U. Choum  
Planning Manager

cc: L.G. Serafini



# South Coast Air Quality Management District

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*Office of the Executive Officer*  
*Wayne Nastri*  
909.396.2100, fax 909.396.3340

January 24, 2020

Mr. Kome Ajise  
Executive Director  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017

Re: Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal Plan) and Draft Program Environmental Impact Report

Dear Mr. Ajise:

Thank you for the opportunity to comment on SCAG’s Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal Plan) and the Draft Program Environmental Impact Report (PEIR). Attached are comments from the South Coast AQMD staff on the Connect SoCal Plan (Attachment 1) and the Draft PEIR for the Connect SoCal Plan (Attachment 2).

1

The 2023 attainment date for the 1997 federal 8-hour ozone standard represents a significant challenge to the South Coast Air Basin (Basin). This attainment challenge (including potential sanctions on highway funding) should be highlighted in the Plan as a regional priority. With goods movement accounting for a significant portion of the mobile source emissions in the Basin, there is a critical need for a new and innovative regional goods movement system that needs to be pursued and developed through a collaborative process. More detailed comments on goods movement are included in Attachment 1.

2

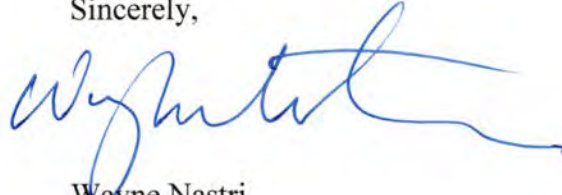
After a review of the Draft PEIR’s air quality and health risk analyses and supporting technical documents, the Draft PEIR likely under-estimated the air quality impacts of the Plan. The Draft PEIR improperly credits the Plan with emission reductions in air quality and health risks that will occur independent of the Plan due to adopted state and federal rules and regulations. Second, SCAG did not utilize South Coast AQMD’s CEQA significance threshold of for health risk impacts. More detailed comments on the Draft PEIR are included in Attachment 2.

3

We are fully committed to continuing to work collaboratively with SCAG and other stakeholders to achieve the vision outlined in this Plan.

4

Sincerely,



Wayne Natri  
Executive Officer

CC: Mr. Ping Chang, Southern California Association of Governments  
Mr. Roland Ok, Southern California Association of Governments  
Ms. Karen Calderon, Southern California Association of Governments

Attachments

Attachment 1 – Comments on Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal Plan)

Attachment 2 – Comments on Draft Program Environmental Impact Report for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy



Attachment 1 - Comments on SCAG's Draft 2020-2045 Regional Transportation Plan /Sustainable Communities Strategy (Connect SoCal Plan).

Attainment of federal air quality standards, a regional priority - The South Coast Air Basin (Basin) is facing a daunting challenge to meet the upcoming deadlines for attaining the health-based federal ozone standards. NOx is the key pollutant causing high ozone levels in our region and must be reduced by 45% and 55% beyond all existing regulations by 2023 and 2031, respectively, to meet federal standards and achieve healthy air for the region. Because over 80% of the NOx in our region is from mobile sources, significant reductions have to come from goods movement sectors (i.e., trucks, cargo handling equipment, rail and ocean-going vessels). Aggressive regulations, advancements in technologies, innovative solutions and integrated land-use and transportation planning as well as coordinated efforts among all stakeholders, at local, state and federal levels are essential to achieve the needed reductions from goods movement activities. We strongly recommend that the challenge of attaining the federal air quality standards be presented in the Connect SoCal Plan as a regional priority calling for a regional solution.

Potential sanctions on transportation funding - On December 31, 2019, South Coast AQMD and California Air Resources Board submitted a jointly-developed Contingency Measure Plan (Plan) to the U.S. EPA to address the required NOx reductions for attaining the 1997 8-hour ozone standard in 2023. The Plan describes additional regulatory actions, programs, and incentive funding South Coast AQMD and CARB have developed to achieve additional emission reductions, and it highlights the critical need for federal regulatory actions and/or funding to address sources under federal jurisdiction (i.e., aircraft, ships, trains, out-of-state trucks), in order to achieve this standard. If U.S. EPA disapproves the Plan, a federal sanctions clock will be triggered, culminating in highway sanctions if the underlying deficiency cannot be corrected. The imposition of highway sanctions results in the loss of federal funds for transportation projects except for certain safety, transit, and air quality beneficial projects. It should be noted that the U.S. EPA does have the option, under the Clean Air Act section 110(m), to apply discretionary sanctions at any time after a disapproval is made. Given the detrimental impact of sanctions to regional transportation planning, we recommend that SCAG highlight the potential sanctions on transportation funding in the Connect SoCal Plan and provide an estimate of the potential impacts.

Need for new innovative regional freight transportation systems - Although goods movement in the SCAG region provides significant positive local, regional and even national economic benefits, it also brings major challenges, including adverse impacts on local and regional air quality, congestion, safety, and roadways. The projected growth in goods movement activity in the SCAG region will further exacerbate the existing conditions. Given the complex nature of the existing transportation networks used for moving import and export cargo, a comprehensive regional solution is needed to address these challenges while improving overall system efficiency. We believe that fundamental changes to the existing networks used for moving cargo need to be earnestly explored and considered.

To signal these needed changes, we recommend that the goods movement project list include at least a \$10 billion funding allocation to identify and deploy innovative zero-emission cargo movement system(s) through a collaborative stakeholder process. The proposed project in the

Connect SoCal Plan will highlight the critical need for a new and innovative goods movement system for the region and will facilitate solicitation of federal funding. South Coast AQMD is fully committed to participate in this process and provide technical assistance.

Ports container forecast – The Ports of Los Angeles and Long Beach handled 17.5 million twenty-foot equivalent unit (TEU) containers in 2018, which represents a 49% increase since the last recession in 2009. The 2016 Mercator Report has provided different container growth forecasts under high growth, expected, and low-growth scenarios. Although the projected growth is expected to continue until at least 2040, the Ports are projected to reach capacity before then. We recommend that the Connect SoCal Plan reflect the latest container forecast as well as identify a potential range of uncertainties based on different forecast scenarios which would also affect the port truck vehicle miles traveled (VMT) and associated emissions.

Goods Movement Environmental Strategy and Technology Advancement Plan – Although we fully support the proposed action plan for zero-emission (ZE) technologies, we recommend that the action plan be expanded to include near-zero (NZE) emission technologies with the acknowledgement that these technologies for medium-duty and heavy-duty trucks are currently in the commercial deployment phase, as discussed in the next section.

Near-term technologies commercially available now to be readily deployed within the next few years - Near-zero natural gas engine technologies are classified as one of the near-term truck technologies in the draft Goods Movement Technical Report (Appendix 1). However, natural gas engine models offered by Cummins Westport Inc. (CWI) are commercially available today and are certified to meet the optional low NOx standard of 0.02 g/bhp-hr. CWI offers the smaller L9N engine that is well suited for transit buses and refuse trucks as well as the larger 12L engine with up to 400 hp to support the demanding drayage duty cycles. In addition, CWI has recently received a CARB certification for their 6.7L engine to support the medium-duty vehicles segment which includes school buses, shuttles and medium-duty trucks. Additional fueling stations will be needed to support the expected increase in deployment of CNG trucks in the near term.

Battery electric trucks have also made significant progress in recent years, especially for the medium-duty vehicles sector. Captive fleets such as shuttles and delivery vans with fixed routes are a good match for this technology as their daily operations can be sufficiently supported by currently available products with 100 to 150 miles in operating range. In addition, because these vehicles are generally recharged overnight at their facilities, charging infrastructure needed to support these vehicles can be tailored based on the anticipated demand and provided in centralized locations. Based on the latest eligible vehicles list for the Hybrid and Zero Emission Truck and Bus Voucher Incentive Project (HVIP), there are several medium-duty trucks and vans that are commercially available for some applications and more products are expected to follow in the near future to support a wider range of vehicle types and vocations. As such, medium-duty battery electric trucks should be classified under the near-term technologies, bifurcating them from heavy-duty battery electric trucks which may require a longer timeline for commercialization. We recommend that these updates for be reflected in the Goods Movement Technical Report.

Encouraging and incentivizing deployment of NZE and ZE technologies - In addition to incentive funding offered by the California Air Resources Board and South Coast AQMD to help offset the higher purchase price of NZE and ZE trucks, a dedicated lane for these trucks on highways and surface streets as well as at port terminals and railyards can provide an effective non-monetary incentive measure to promote and accelerate deployment of NZE and ZE technologies. We recommend that these types of incentive measures (e.g., dedicated lanes, parking spots/curb areas for deliveries) be considered and incorporated into the proposed goods movement projects, where appropriate.

Zero-Emission Infrastructure Study - We appreciate SCAG's proposed study on charging infrastructure needed for electric trucks. This effort is timely and can work well in partnership with other efforts currently underway with the Public Utilities Commission<sup>1</sup> (PUC) and the California Energy Commission<sup>2</sup> (CEC). While those two efforts are focused on the needs and limitations of the electric grid, SCAG can provide a critical perspective and bring unique expertise as a regional transportation planning agency. We encourage SCAG to coordinate with PUC, CEC, and other key stakeholders including local utilities as this proposed study proceeds. We look forward to continuing to engage with SCAG on this effort.

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<sup>1</sup> Proceeding R1812006 (Transportation Electrification Framework):

[https://apps.cpuc.ca.gov/apex/f?p=401:56:0::NO:RP,57,RIR:P5\\_PROCEEDING\\_SELECT:R1812006](https://apps.cpuc.ca.gov/apex/f?p=401:56:0::NO:RP,57,RIR:P5_PROCEEDING_SELECT:R1812006)

<sup>2</sup> CEC is conducting multiple efforts to evaluate transportation electrification needs, including through its current Integrated Energy Policy Report work, and through work to implement AB 2127.

Attachment 2 - Comments on SCAG’s Draft Program Environmental Impact Report for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for SCAG and should be incorporated into the Final PEIR.

6

**South Coast AQMD Staff’s Summary of Project Description**

The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is a long-range transportation and land use plan for six counties and 191 cities in Southern California (Proposed Project). It takes into account the changing socioeconomic, transportation, financial, technological, and environmental conditions, and serves as a blueprint to guide the region’s future transportation and land use development for more than 20 years. It includes a plan of transportation investments and strategies to enhance the performance and safety of the region’s transportation network that comprises of highways, arterials, roadways, transit systems, rail, seaports, and airports. It integrates technologies for the transportation and movement of people and goods, including zero and near-zero emissions technologies and infrastructure. The Proposed Project also includes land use strategies that are coordinated with transportation strategies to accommodate a net growth of 3.2 million people, 1.4 million households, and 1.4 million jobs between 2019 and 2045<sup>1</sup> around job centers, transit priority areas, high quality transit areas, neighborhood mobility areas, and livable corridors. It balances transportation and land use strategies to meet the region’s needs in improving air quality and public health, reducing greenhouse gas emissions, and building a more sustainable, equitable, and economically vibrant future.

7

**Summary of South Coast AQMD Staff’s Comments on the Air Quality and Health Risk Assessment Analyses in the Draft PEIR**

Based on reviews of the Draft PEIR and supporting technical documents, South Coast AQMD staff has ten comments on the air quality and health risk analyses. A summary of these comments is provided as follows with additional details provided later in this attachment.

1. CEQA Baseline: SCAG quantified on-road mobile source emissions for the existing conditions without the Proposed Project (year 2019) and the future conditions with the Proposed Project (year 2045) and compared those emissions to determine the level of significance. Based on this analysis, the Proposed Project would mostly reduce emissions, except for PM2.5 and PM10 emissions in some parts of the region due to increases in vehicle miles travel (VMT) between 2019 and 2045 in all counties<sup>2</sup>. This analysis approach improperly credits the Proposed Project with emission reductions in air quality and health risks that will occur independent of the Proposed Project due to adopted state and federal rules and regulations. SCAG should compare the emissions with the Proposed Project to the emissions without the Proposed Project in the same interim analysis years and use the comparison to determine the level of significance for the Proposed Project’s air quality impacts from on-road mobile sources.

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<sup>1</sup> Draft PEIR. Page 2.0-14.  
<sup>2</sup> *Ibid.* Pages 3.3-57 to 61.

2. Air Quality CEQA Thresholds of Significance: SCAG quantified the Proposed Project’s on-road mobile source emissions of criteria pollutants for the region but did not compare the South Coast AQMD’s portion of the emissions to South Coast AQMD’s regional air quality CEQA significance thresholds to determine the level of significance. Evaluation of air quality impacts, unlike some other impact areas, easily lends itself to quantification. Not only does quantification make it easier for the public and decision-makers to understand the breadth and depth of the potential air quality impacts, but it also facilitates the identification of mitigation measures required to reduce any significant adverse air quality impacts. SCAG should identify the South Coast AQMD’s portion of the on-road mobile source emissions and compare those emissions to South Coast AQMD’s regional air quality CEQA significance thresholds in the Final PEIR to determine the level of significance.

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3. Interim Analysis Years: The air quality analysis in the Draft PEIR included only two analysis years: baseline year (2019) and buildout year (2045). The overall emission rates of vehicles and trucks are generally higher in earlier years as more stringent emission standards and cleaner technologies have not been fully implemented, and fleets have not fully turned over. With only two analysis years for air quality, the Draft PEIR did not fully and adequately disclose the peak daily emissions from on-road mobile sources. SCAG should include interim analysis years for the air quality analysis, corresponding to the same interim analysis years (i.e., year 2020, year 2030, and year 2035) that were used to quantify the Proposed Project’s greenhouse gas emissions.

10

4. Air Quality Impact Analysis: The Draft PEIR discussed the existing air quality conditions based on the South Coast AQMD’s 2016 AQMP forecasts, but did not quantify emissions from implementing the Proposed Project’s transportation strategies for off-road mobile sources (e.g., locomotives, ocean-going vessels, commercial harbor craft, cargo handling equipment, farm equipment, and aircraft<sup>3</sup>) or land use strategies. However, SCAG quantified GHG emissions for off-road vehicles (rail, aviation, and ocean-going vessels), building energy, and water-related energy consumptions but did not quantify emissions from criteria pollutants for these sources. Therefore, the analysis approach for air quality is not consistent with the GHG emissions analysis which included both on-road and off-road mobile sources, and should be revised in the Final EIR.

11

5. Air Quality Impacts from Overlapping Construction and Operational Activities: The Draft PEIR did not analyze a scenario where construction activities overlap with operational activities. Since the Proposed Project will be implemented over a period of 20 years, an overlapping construction and operation scenario from transportation and land use projects is reasonably foreseeable and should be analyzed in the Final PEIR.

12

6. Health Risk Assessment (HRA) Analysis: SCAG did not utilize South Coast AQMD’s CEQA significance threshold of 10 in a million to determine the level of significance for the Proposed Project’s health risk impacts. Even though some of the transportation segments that were selected for the HRA analysis show cancer risk that would substantially exceed the significance threshold (e.g., 41.3 in a million), SCAG found that the Proposed Project’s

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<sup>3</sup> *Ibid.* Page 3.2-6.

health risk impacts would be less than significant<sup>4</sup> because cancer risk for each transportation segment in 2045 is significantly reduced when it is compared to that in 2019. This is an improper comparison to determine the level of significance for cancer risk and should be revised in the Final EIR. (See also Comment No. 1).

13

7. Project-level Air Quality Mitigation Measure: SCAG recommended the use of Tier 4 construction equipment by projects within 500 feet of residences, hospitals, or schools. To encourage the use of Tier 4 Final construction equipment by all types of transportation and land use projects, South Coast AQMD staff recommends the use of Tier 4 Final construction equipment and more information on the implementation and monitoring of this mitigation measure be provided in the Final EIR.

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8. Additional Project-Level Air Quality Mitigation Measures for On-Road Mobile Sources: The Draft PEIR serves as the first-tier, programmatic level analysis that can provide guidance to subsequent, project-level environmental analyses. To facilitate this, South Coast AQMD staff recommends that SCAG include additional project-level mitigation measures for on-road mobile sources in the Final EIR. SCAG should also review the Community Emission Reduction Plans that are prepared pursuant to Assembly Bill 617 to explore whether additional mitigation measures can be identified and included in the Final EIR.

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9. Additional Project-Level Air Quality Mitigation Measures for Off-Road Mobile Sources: The Draft PEIR did not include project-level air quality mitigation measures for off-road mobile sources (e.g., aircraft and ground service equipment, cargo handling equipment, locomotives, shore power and infrastructure, and ocean-going vessels). Since the Proposed Project includes transportation strategies for rail, seaports, and airports, SCAG should develop and include project-level mitigation measures or performance standards for off-road mobile sources as part of PMM-AQ-1 in the Final EIR.

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10. Health Risk Reduction Strategies: Although the Proposed Project would result in development of new transportation projects near existing sensitive receptors or locating new receptors near transportation projects, the Draft PEIR did not include a discussion on how to disclose health risks and reduce exposures when new sensitive land uses are sited within 500 feet of freeways or other sources of air pollution. To provide guidance for subsequent, project-level environmental analyses, South Coast AQMD staff recommends that SCAG include a discussion on the mobile source HRA analysis and health risk reduction strategies in the Final PEIR.

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South Coast AQMD staff's detailed comments on the Draft EIR's air quality analysis and health risk assessment are provided as follows.

1. CEQA Baseline

Under CEQA, baseline conditions exist at the time of the environmental review is initiated or as they exist at the time the Notice of Preparation (NOP) is published, if there is a published NOP. Notwithstanding this general rule, the use of future baseline is proper in some cases, when supported by substantial evidence in the record. Consideration of future conditions in

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<sup>4</sup> *Ibid.* Page 77.

determining whether a project’s impacts may be significant is consistent with CEQA’s rules regarding baseline, especially when the project has a long-term implementation schedule such as the Proposed Project. “[N]othing in CEQA law precludes an agency ... from considering both types of baseline—existing and future conditions—in its primary analysis of the project’s significant adverse effects.” (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 454.). “Even when a project is intended and expected to improve conditions in the long term—20 or 30 years after an EIR is prepared—decision makers and members of the public are entitled under CEQA to know the short- and medium-term environmental costs of achieving that desirable improvement. ... [¶] ... The public and decision makers are entitled to the most accurate information on project impacts practically possible, and the choice of a baseline must reflect that goal.” (See also *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310).

SCAG quantified the Proposed Project’s on-road mobile source emissions for the 2019 baseline year and the 2045 future year. The 2019 existing conditions were held constant (i.e. using emission rates from year 2019) and compared to the 2045 future year (i.e. using emission rates from the future year). SCAG found that ROG and NOx emissions with the Proposed Project in 2045 would be lower than the existing conditions in 2019, but PM2.5 and PM10 emissions would increase due to VMT increases across the region<sup>5</sup>. This approach using a comparison between the Proposed Project’s impacts in the future year (using emission rates from year 2045) and the 2019 baseline (using emission rates from year 2019) improperly credits the Proposed Project with emission reductions that will occur independent of the Proposed Project due to adopted federal and state rules and regulations, and clean vehicle and fuel technologies, since these rules, regulations, and technologies are expected to improve air quality over time, even in the absence of the Proposed Project, which SCAG has acknowledged in the Draft PEIR<sup>6</sup>. For example, the California Air Resources Board’s (CARB) current regulation for trucks and buses will provide significant near-term and long-term reductions in NOx emissions from trucks and buses, at 98 tons per day for 2023<sup>7</sup>. Since the Proposed Project anticipates that VMT will increase between 2019 and 2045 in all counties<sup>8</sup>, NOx emission reductions in year 2045 are likely due to implementation of CARB’s regulation and other efforts at promoting zero and near-zero emissions vehicles and cleaner fuel standards. Therefore, the baseline used to analyze the Proposed Project’s long-term air quality impacts from on-road mobile sources in the Draft PEIR likely led to an under-estimation of actual emission increases, and is misleading and uninformative.

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The purpose of CEQA is to disclose environmental impacts from the Proposed Project to the public and decision makers to provide the public and decision makers with the actual changes to the environment from the activities involved in the Proposed Project. By taking credit for future emission reductions from existing air quality rules, regulations, and technologies that are not contributed by the Proposed Project, the Proposed Project’s air quality impacts are

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<sup>5</sup> *Ibid.* Pages 3.3-57 to 61.

<sup>6</sup> *Ibid.*

<sup>7</sup> California Air Resources Board. July 14, 2017. Trucks and Bus Regulation: On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation. Accessed at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>, and <https://www.arb.ca.gov/msprog/onrdiesel/documents/truckrulehealth.pdf>.

<sup>8</sup> Draft PEIR. Pages 3.3-57 to 61.

likely underestimated. Therefore, South Coast AQMD staff recommends that SCAG revise the air quality analysis to calculate emissions in year 2019, year 2020, year 2030, year 2035, and year 2045 with the Proposed Project and emissions in those same years without the Proposed Project. These interim analysis years correspond to the same interim analysis years that SCAG used to quantify the Proposed Project’s greenhouse gas (GHG) emissions<sup>9</sup>. (See also Comment No. 3). SCAG should compare the emissions with the Proposed Project to the emissions without the Proposed Project in the same interim analysis years and use the comparison to determine the level of significance for the Proposed Project’s air quality impacts from on-road mobile sources.

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2. Air Quality CEQA Thresholds of Significance

While CEQA allows that a Lead Agency may select a threshold to determine the level of significance, SCAG may not apply a threshold of significance in a manner that precludes consideration of substantial evidence demonstrating that there may be a significant effect on the environment. Evaluation of air quality impacts, unlike some other impact areas, easily lends itself to quantification. Not only does quantification make it easier for the public and decision-makers to understand the breadth and depth of the potential air quality impacts, but it also facilitates the identification of mitigation measures required to reduce any significant adverse air quality impacts. South Coast AQMD’s CEQA thresholds of significance for air quality provide a clear quantitative benchmark to determine the level of significance for a project’s air quality impacts. Therefore, for most projects within the South Coast AQMD’s jurisdiction, South Coast AQMD’s air quality CEQA significance thresholds for construction and operation<sup>10</sup> are used to determine the level of significance of a project’s air quality impacts.

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SCAG quantified the Proposed Project’s on-road mobile source emissions of criteria pollutants for the region but did not compare the South Coast AQMD’s portion of the emissions to South Coast AQMD’s regional air quality CEQA significance thresholds to determine the level of significance. Since the South Coast AQMD relies on SCAG’s air quality analysis for on-road mobile sources, South Coast AQMD staff recommends that SCAG identify the South Coast AQMD’s portion of the on-road mobile source emissions and compare those emissions to South Coast AQMD’s regional air quality CEQA significance thresholds in the Final PEIR to determine the level of significance. Using South Coast AQMD’s CEQA significance thresholds would clearly disclose the magnitude of air quality impacts from on-road mobile sources, facilitate the identification of feasible mitigation measures, strengthen the evaluation of the level of impacts before and after mitigation measures, and contribute to the selection of a range of reasonable alternatives to the Proposed Project based on the air quality impacts.

3. Air Quality Interim Analysis Years

The air quality analysis in the Draft PEIR included only two analysis years: baseline year (2019) and buildout year (2045). (See also Comment No.1). Although the Proposed Project may not be at the peak development capacity in earlier years, it is possible that due to higher

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<sup>9</sup> Draft PEIR. Section 3.8. Table 3.8-8. Page 3.8-64.

<sup>10</sup> South Coast Air Quality Management District. March 2015. *South Coast AQMD Air Quality Significance Thresholds*. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.



emission rates of vehicles and trucks in earlier years, peak daily emissions from on-road mobile sources may occur early and gradually decrease over time. The overall emission rates of vehicles and trucks are generally higher in earlier years as more stringent emission standards and cleaner technologies have not been fully implemented, and fleets have not fully turned over. Air quality is improving over time with substantial emission reductions occurring in later years. Therefore, South Coast AQMD staff recommends that SCAG include interim analysis years for the air quality analysis, corresponding to the same interim analysis years (i.e., year 2020, year 2030, and year 2035) that SCAG used to quantify the Proposed Project’s GHG emissions<sup>11</sup>, to ensure the peak daily emissions are identified and adequately disclosed in the Final PEIR. The interim analysis years will also demonstrate progress in emission reductions over time from implementing the Proposed Project’s strategies and the air quality mitigation measures included in the PEIR.

4. Air Quality Impact Analysis Based on the South Coast AQMD’s 2016 AQMP Forecasts

As stated above, the Proposed Project includes transportation strategies and investments for the region’s transportation network of roads, highway, arterials, transit, rail, seaports, and airports. It also includes land use strategies to promote a more compact form of development. To analyze the air quality impacts, SCAG used the South Coast AQMD’s 2016 AQMP forecasts of annual average off-road mobile emissions and stationary source emissions for years 2019, 2022, 2023, 2025, and 2031 in the Basin as a proxy for these emissions throughout the SCAG region<sup>12</sup>.

This analysis approach is not appropriate for three reasons. First, the 2016 AQMP forecasts are emission inventories and projections, using 2012 as the base year and air quality measures implemented since adopting the 2012 AQMP<sup>13</sup>. They provide the historic (since 2012) and existing air quality conditions in 2019 at the time the Draft PEIR was prepared. Therefore, SCAG discussed the existing air quality conditions, but did not properly assess the incremental air quality impacts of direct emissions from implementing the Proposed Project’s transportation strategies for off-road mobile sources (e.g., locomotives, ocean-going vessels, commercial harbor craft, cargo handling equipment, farm equipment, and aircraft<sup>14</sup>) or land use strategies. Second, the 2016 AQMP forecasts include emission projections until year 2031. Since the Proposed Project has a planning horizon until year 2045, it is not appropriate to use the 2016 AQMP forecasts, which are baseline conditions, to analyze the air quality impacts from the Proposed Project, which will be implemented beyond year 2031. Third, the Proposed Project covers a six-county region and includes five air quality and air pollution control districts, including the South Coast AQMD. In the Draft PEIR, SCAG used the 2016 AQMP forecasts for the South Coast AQMD as a proxy for emissions throughout the entire region but did not provide emissions from other air districts or explain why it was appropriate to use the South Coast AQMD’s forecasts as a proxy for the SCAG region. Even if using the 2016 AQMP forecasts is found to be an adequate analysis methodology, SCAG only analyzed a portion of the region within the South Coast AQMD. Therefore, South Coast

<sup>11</sup> Draft PEIR. Section 3.8. Table 3.8-8. Page 3.8-64.

<sup>12</sup> *Ibid.* Page 3.3-55.

<sup>13</sup> South Coast AQMD. Final Program EIR for the 2016 AQMP. Page 2-13. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2016/2016aqmpfpeir.pdf>.

<sup>14</sup> *Ibid.* Page 3.2-6.

AQMD staff recommends that SCAG revise the air quality analysis in the Final PEIR based on the following recommendations.

*Air Quality Analysis for Construction and Operational Air Quality Impacts*

When specific development is reasonably foreseeable as a result of the goals, policies, and strategies in the Proposed Project, SCAG should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the PEIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Preparing the CEQA analysis “necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can” (CEQA Guideline Section 15144).

When the precise construction and operational scenarios are unknown, SCAG should use its best efforts to identify and quantify a worst-case construction and operational air quality impact scenario that is reasonably foreseeable at the time the Draft PEIR is prepared. While this comment may not change SCAG’s findings that the Proposed Project’s construction and operational air quality impacts would be significant and unavoidable<sup>15</sup>, a quantitative analysis will facilitate the goal and purpose of CEQA on public disclosure with useful information on the magnitude of air quality impacts that could occur from implementing the Proposed Project and foster meaningful public participation and informed decision making.

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Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). As discussed in Section 2.0, *Project Description*, in the Draft PEIR, the Proposed Project anticipates an annual growth rate of 0.6 percent, resulting in a net growth of 3.2 million people, 1.4 million households, and 1.4 million jobs between 2019 and 2045<sup>16</sup>. To accommodate growth, SCAG has identified development potential around the region’s job centers, transit priority areas, high quality transit areas, neighborhood mobility areas, and livable corridors. Therefore, SCAG can and should use this information to develop a construction scenario for land use development. One way to calculate the Proposed Project’s construction emissions would be based on an estimated average annual level of development. SCAG should use the most current version of California Emission Estimator Model (CalEEMod)<sup>17</sup> to quantify construction emissions and compare the emissions to air districts’ regional air quality CEQA significance thresholds to determine the level of significance.

Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular

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<sup>15</sup> *Ibid.* Pages 3.3-60 and 61.

<sup>16</sup> Draft PEIR. Page 2.0-14.

<sup>17</sup> South Coast AQMD. CalEEMod Version 2016.3.2. Accessed at: <http://www.aqmd.gov/caleemod/download-model>.

trips (e.g., on- and off-road tailpipe emissions and entrained dust). In Section 3.8, *Greenhouse Gases*, in the Draft PEIR, in addition to quantifying GHG emissions for on-road mobile sources, SCAG quantified GHG emissions for off-road vehicles (rail, aviation, and ocean-going vessels), building energy, and water-related energy consumptions in year 2019 (baseline year), year 2020 (with and without the Proposed Project), year 2030 (with the Proposed Project), year 2035 (with the Proposed Project), and year 2045 (with and without the Proposed Project)<sup>18</sup>. To be consistent with the GHG emissions analysis which included both on-road and off-road vehicles, and to provide a better and more complete understanding of the Proposed Project’s operational air quality impacts, South Coast AQMD staff recommends that SCAG quantify the Proposed Project’s operational emissions for off-road vehicles and add those emissions to on-road mobile source emissions to determine the level of significance in the Final PEIR. (See also Comment Nos 1 and 3). If emissions from off-road vehicles are not included in the Final PEIR, SCAG should provide reasons for not including them supported by substantial evidence in the record.

21

5. Air Quality Analysis – Overlapping Construction and Operational Activities

Based on a review of the air quality analysis, South Coast AQMD staff found that SCAG did not analyze a scenario where construction activities overlap with operational activities. Since implementation of the Proposed Project is expected to occur over a period of 20 years, an overlapping construction and operation scenario from transportation and land use projects is reasonably foreseeable. Therefore, South Coast AQMD staff recommends that SCAG discuss an air quality impact scenario where construction and operational activities overlap and make a significance determination in the Final PEIR; otherwise, SCAG has not discussed the Proposed Project’s air quality impacts from overlapping construction and operational activities that will likely take place during the implementation of the Proposed Project in the PEIR.

22

6. Health Risk Assessment (HRA) Analysis

Implementation of the Proposed Project would result in development of new transportation projects near existing sensitive receptors or locating new receptors near transportation projects<sup>19</sup>. SCAG conducted a mobile source HRA analysis to evaluate the cancer risk for residents from exposures to DPM emissions from 16 transportation segments throughout the SCAG region. As shown in Table 3.3-16 in the Draft PEIR, the highest cancer risk would be 41.3 in a million along Interstate 15 in the Victorville area in San Bernardino County (Segment 13: SB I-15 VIC), followed by 30.9 in a million along Interstate 710 in the Compton area in Los Angeles County (Segment 4: LA I-710)<sup>20</sup>. Because cancer risk for each of transportation segment in 2045 is significantly reduced when it is compared to that in 2019, SCAG determined that the Proposed Project’s health risk impacts would be less than significant.

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South Coast AQMD staff does not agree with SCAG’s significance determination. It is not appropriate to determine the level of significance for cancer risk based on a comparison between the existing condition (year 2019) and the future condition (year 2045). (See also

<sup>18</sup> Draft PEIR. Pages 3.8-62 to 66.

<sup>19</sup> *Ibid.* Page 3.3-76.

<sup>20</sup> *Ibid.* Table 3.3-16.

Comment No. 1 on CEQA Baseline). To determine the level of significance for cancer risk, South Coast AQMD staff recommends that SCAG compare the maximum exposed individual residential cancer risk for each of the transportation segments in 2045 to South Coast AQMD’s CEQA significance threshold of 10 in a million for cancer risk in the Final PEIR. As shown in Table 3.3-16, 12 of 16 transportation segments would exceed the CEQA significance threshold of 10 in a million for cancer risk.

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7. Recommended Revisions Existing Project-Level Mitigation Measure (PMM-AQ-1 q))

SCAG included a project-level air quality mitigation measure (PMM-AQ-1 a) through q) for consideration by lead agencies that implement individual transportation and land use projects. South Coast AQMD staff recommends that SCAG incorporate the following revisions to PMM-AQ-1 q) in the Final PEIR. The recommended revisions will provide more details on the requirement for Tier 4 construction equipment, provide guidance on project-level implementation and monitoring, and facilitate CEQA streamlining and tiering as an option from the PEIR by subsequent, project-level environmental analyses, where appropriate.

- a) **PMM-AQ-1 q)** ~~Require projects within 500 feet of residences, hospitals, or schools to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). Include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit’s certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment. Require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that construction equipment cannot meet the Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer’s recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds.~~

24

8. Additional Recommended Project-Level Mitigation Measures

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse impacts. The Proposed Project is a blueprint for the region’s future development. The Draft PEIR for the Proposed Project serves as the first-tier, programmatic level analysis that can provide guidance to subsequent, project-level environmental analyses. Therefore, it

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is the intent of SCAG that lead agencies for individual transportation and land use projects that may be eligible for CEQA streamlining incorporate project-level mitigation measures as feasible and appropriate to tier from the PEIR<sup>21</sup>.

On February 19, 2019, South Coast AQMD staff provided comments on the Notice of Preparation (NOP) for the Proposed Project, available at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2019/february/ALL190123-01.pdf>, and recommended specific air quality mitigation measures for SCAG to include in the Draft PEIR. South Coast AQMD staff incorporates by reference those recommended mitigation measures and requests that SCAG include them in the Final PEIR. Specifically, SCAG should include the following mitigation measures to reduce and accelerate the reduction of on-road mobile source emissions. The recommended mitigation measures are consistent with the Proposed Project's goal of improving air quality and public health (Goal No. 5)<sup>22</sup>, provide guidance on the feasibility of mitigation measures with specific performance standards, and support the Draft PEIR's intended use as the first-tier, programmatic environmental analysis to facilitate CEQA streamlining and tiering by subsequent, project-level environmental analyses.

- Require zero-emissions (ZE) or near-zero emissions (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. At a minimum, require that vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export) that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks<sup>23</sup>. When requiring ZE or NZE on-road haul trucks, SCAG should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final PEIR, where appropriate. To monitor and ensure ZE, NZE, or 2010 model year or newer trucks are used, require that operators maintain records of all trucks associated with the operation, and make these records available to SCAG upon request. The records will serve as evidence to prove that each truck called met the minimum 2010 model year engine emission standards. Alternatively, require periodic reporting and provision of written records by operators, and conduct regular inspections of the records to the maximum extent feasible and practicable.
- Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.

<sup>21</sup> *Ibid.* Page 2.0-40

<sup>22</sup> *Ibid.* Page 2.0-21.

<sup>23</sup> Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/Filename/000000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

- Enter into applicable bid documents, purchase orders, and contracts to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy<sup>24</sup>. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the site. To further ensure that drivers understand the vehicle idling requirement, post signs at the site, where appropriate, stating that idling longer than five minutes is not permitted.
- Require at least five percent of all vehicle parking spaces include electric vehicle (EV) charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. Electrical hookups should be provided at the onsite vehicle stop for to plug in any onboard auxiliary equipment. Electrical panels should be appropriately sized to allow for future expanded use. Include analyses to evaluate and identify sufficient power available for zero emissions trucks and supportive infrastructures (e.g., EV charging stations) in the Energy and Utilities and Service Systems Sections of the Final PEIR, where appropriate.
- The Proposed Project includes areas that are heavily impacted by air pollution. Assembly Bill (AB) 617, which was signed into law in 2017, requires South Coast AQMD to work with community and other stakeholders to identify and address community concerns in disadvantaged communities suffering from disproportionate air pollution impacts generated from sources, such as marine ports, warehouses, railyard facilities, heavy-duty diesel trucks, and oil drilling and production facilities. Through the AB 617 program, each of the designated AB 617 communities and South Coast AQMD staff develop a Community Emissions Reduction Plan (CERP) that identifies air quality priorities and actions to reduce air pollution in the community. In September 2019, the South Coast AQMD's Governing Board approved three CERPs for the AB 617 communities of Wilmington, Carson, and West Long Beach; East Los Angeles, Boyle Heights, and West Commerce; and San Bernardino and Muscoy that were designated in 2018<sup>25</sup>. In December 2019, two new AB 617 communities in the Southeast Los Angeles and the Eastern Coachella Valley were designated for inclusion in South Coast AQMD's AB 617 Program<sup>26</sup>. South Coast AQMD staff recommends that SCAG review the CERPs<sup>27</sup> to explore whether additional mitigation measures can and should be included as part of PMM-AQ-1 in the Final PEIR for transportation and land use projects that may use the PEIR for CEQA streaming and tiering.

<sup>24</sup>California Air Resources Board. June 2009. *Written Idling Policy Guidelines*. Accessed at: <https://www.arb.ca.gov/msprog/ordiesel/guidance/writtenidlingguide.pdf>.

<sup>25</sup> South Coast AQMD. AB 617 Community Air Initiatives. Accessed at: <http://www.aqmd.gov/nav/about/initiatives/community-efforts/environmental-justice/ab617-134>.

<sup>26</sup> *Ibid.*

<sup>27</sup> South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/news-events/meeting-agendas-minutes/agenda?title=governing-board-meeting-agenda-september-6-2019>.

9. Since the Proposed Project includes transportation strategies for rail, seaports, and airports, SCAG should develop and include project-level mitigation measures for off-road mobile sources as part of PMM-AQ-1 in the Final EIR. If the specific details are impractical or infeasible to include, SCAG should develop and include performance standards that the off-road mobile source mitigation measures will achieve (CEQA Guidelines Section 15126.4(a)). Including the mitigation measures and performance standards for off-road mobile sources fulfills SCAG's legal obligation as SCAG for the Proposed Project to comply with CEQA's requirements for mitigation measures, serves as a guidance on the feasibility of mitigation measures that can and should be implemented by transportation and land use projects at the region's seaports and airports, and supports tiering by subsequent, project-level environmental analyses. Specifically, South Coast AQMD staff recommends that the Final PEIR includes the following project-level mitigation measures or other comparable mitigation measures for aircrafts, ground service equipment, cargo handling equipment, locomotives, and ocean-going vessels in PMM-AQ-1.

*Aircraft and Ground Service Equipment (GSE)*

- Encourage and incentivize aircraft operators to route the cleanest aircraft engines to serve the South Coast Air Basin.
- Consider operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible and as allowed per Federal Aviation Administration guidelines.
- Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project.
- Require the use of GSE that can operate on electric battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum.

*Cargo Handling Equipment (CHE)*

- Develop specific timelines for transitioning to zero emissions CHE. For example, South Coast AQMD staff recommends a step-down program to require any off-road equipment to be zero emissions first, followed by near-zero emissions, then Tier 4 alternative fuels, and then Tier 4 engine as a floor. The criteria for a step-down program can be based on availability of equipment at the time of purchase and cost of equipment compared to the Tier 4 floor after considering available incentive funds.
- Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.

*Rail and Locomotives*

- Offer incentives to encourage the use of on-dock rail.
- Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards.

*Shore Power and Infrastructure*

- Use shore side electric power for ships, which may include tugboats and other ocean-going-vessels or develop incentives to gradually ramp up the usage of shore power.

Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized.

*Ocean-Going Vessels*

- Maximize participation in the Vessel Speed Reduction Program for all vessels transiting within 40 nautical miles of Point Fermin in the region.
- Encourage the participation in the Green Ship Incentives.

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10. Health Risk Assessment for New Sensitive Land Uses Near Freeways and Other Sources of Air Pollution and Health Risk Reduction Strategies

Notwithstanding the court rulings, South Coast AQMD staff recognizes that the lead agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD staff’s concern about the potential public health impacts of siting sensitive populations within close proximity of freeways or other sources of air pollution, South Coast AQMD staff recommends that, prior to approving the project, lead agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

Implementation of the Proposed Project would result in development of new transportation projects near existing sensitive receptors or locating new receptors near transportation projects<sup>28</sup>. To disclose the potential health risks for new sensitive land uses that will be sited within 500 feet of freeways or other sources of air pollution, South Coast AQMD staff recommends a mobile source HRA analysis be performed<sup>29</sup>. Since the PEIR is intended to serve as the first-tier, programmatic analysis for projects in the region, South Coast AQMD staff recommends that SCAG include a discussion on the mobile source HRA analysis in the Final PEIR<sup>30</sup> to provide guidance for subsequent, project-level environmental analyses that will tier from the PEIR. Additionally, South Coast AQMD staff recommends that SCAG include the following health risk reduction strategies in the Final PEIR as guidance for future sensitive land use projects that will be sited in close proximity to freeways or other sources of air pollution. These strategies were included in the South Coast AQMD staff’s comment letter on the NOP for the Proposed Project<sup>31</sup>.

27

- Consider high efficiency or enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better for sensitive land use projects that are located within 500 feet of freeways and other sources of air pollution. Enhanced filtration units are capable of reducing exposures. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

<sup>28</sup> Draft PEIR. Page 3.3-76.

<sup>29</sup> South Coast AQMD. “Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis.” Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>30</sup> South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as SCAG, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

<sup>31</sup>South Coast AQMD staff. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2019/february/ALL190123-01.pdf>.



- Enhanced filtration systems have limitations. In a study that South Coast AQMD conducted to investigate filters<sup>32</sup>, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. The initial start-up cost could substantially increase if an HVAC system needs to be installed. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the residents. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail and disclosed to prospective residents prior to assuming that they will sufficiently alleviate health risk exposures to toxic air emissions.
- Because of the limitations, South Coast AQMD staff recommends additional details regarding the ongoing, regular monitoring, inspection, and maintenance of filters be provided. To facilitate a good faith effort at full disclosure and provide useful information to future sensitive receptors who will live and/or work in proximity to freeways or other sources of air pollution, the following information should be included, at a minimum, as guidance to future sensitive land use projects in the subsequent, project-level environmental analyses:
  - a) Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open and/or when residents are outdoors (e.g., in the common usable open space areas);
  - b) Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued;
  - c) Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are inspected and maintained regularly;
  - d) Disclose the potential increase in energy costs for running the HVAC system to prospective residents;
  - e) Provide information to residents on where MERV filters can be purchased;
  - f) Provide recommended schedules (e.g., every year or every six months) for replacing the enhanced filtration units;

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<sup>32</sup> This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

- g) Identify the responsible entity such as future residents themselves, Homeowner’s Association (HOA), or property management for ensuring enhanced filtration units are replaced on time, if appropriate and feasible (if residents should be responsible for the periodic and regular purchase and replacement of the enhanced filtration units, the individual project’s lead agency should include this information in the disclosure form);
- h) Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units;
- i) Set criteria for assessing progress in installing and replacing the enhanced filtration units; and
- j) Develop a process for evaluating the effectiveness of the enhanced filtration units.

27

**Conclusion**

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that SCAG provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final PEIR. Issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, when SCAG makes the finding that the recommended revisions to existing air quality mitigation measures and additional new air quality mitigation measures are not feasible, SCAG should describe the specific reasons supported by substantial evidence for rejecting them in the Final PEIR (CEQA Guidelines Section 15091).

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SN:JW:LS  
ALL191210-01  
Control Number



REG-3

**VENTURA COUNTY  
AIR POLLUTION CONTROL DISTRICT**  
Memorandum

TO: Southern California Association of Governments (SCAG)  
DATE: January 23, 2020  
FROM: Nicole Collazo, Planning Division  
SUBJECT: Public Comment for Draft Programmatic Environmental Impact Report (DPEIR)  
for the Connect SoCal 2020-2045 RTP/SCS Project (RMA 19-001-1)

The Ventura County Air Pollution Control District (APCD) staff has reviewed the DPEIR for the project referenced above in the areas of Air Quality and Greenhouse Gases for Ventura County. The project is a long-range regional transportation plan that provides a blueprint for the region to achieve coordinated regional land use strategies and transportation investments. The project location extends the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The project Lead Agency for preparation of the DPEIR is SCAG.

1

**GENERAL COMMENTS**

In accordance with State CEQA Statute Section 21091, APCD submits this memo as commenting agency to the Lead Agency for the project referenced above.

Air Quality

Item 1- Page 3.3-19. It should be clarified that emissions presented in Table 3.3-5 are *motor vehicle emissions*, not stationary or grand total county emission estimates.

2

Item 2- Page 3.3-46. Per the latest CEQA Guidelines Update, item b of the Appendix G Environmental Checklist Form is no longer recommended (Violate any air quality standard or contribute substantially to an existing or projected air quality violation?).

3

Item 3- Page 3.3-56. The statement “The SCCAB and portions are the SSAB are also in nonattainment for PM2.5.” is incorrect. The SCCAB (Ventura Portion) is in attainment for PM2.5, as shown in Table 3.3-4.

4

Greenhouse Gases

Item 1- Page 3.8-49. Under the Ventura County section, a brief summary should be included regarding the County of Ventura’s proposed Climate Action Plan. More information can be found [here](#).

5

Item 2- Table 3.8-4. The County of Ventura is currently developing a Climate Action Plan (CAP) that is being integrated into its General Plan Update 2020-2040. It also contains General Plan Implementation Measures for GHG-reductions and General Plan Policies related to climate change. The County’s CAP has not been adopted yet. A DEIR was publicly released on January 13, 2020. More information can be found [here](#). The table has a CAP as adopted(A). The General Plan Update contains General Plan Implementation Measures for GHG-reductions and General Plan Policies related to climate change, as listed in Table 3.8-4.

6

Item 3- Page 3.8-67. We’d like to note that an even larger fire, the Thomas Fire, occurred in December 2017, burning approximately 281,893 acres and damaging/destroying 1,343 structures.

7

Thank you for the opportunity to comment on the DPEIR. Should you have any questions, you may reach me at 805-645-1426 or via email at [nicole@vcapcd.org](mailto:nicole@vcapcd.org).

8



Orange County Council of Governments

Orange County Council of Governments (OCCOG)  
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**SUB-1**

*January 23, 2020*

Mr. Kome Ajise  
Executive Director  
Southern California Association of Governments  
900 Wilshire, Suite 1700  
Los Angeles, California 90017

**Subject:** *Orange County Council of Governments Comments for Connect SoCal 2020 RTP/SCS and PEIR*

*Transmitted via email*

**Dear Mr. Ajise:**

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2020 - 2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal) and the associated Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2020 RTP/SCS and PEIR. The ad hoc committee includes representation from the OCCOG; the cities of Anaheim, Irvine, San Clemente, and Yorba Linda; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; and the Center for Demographic Research at California State University Fullerton. This committee met four times during the public comment period, and has collectively spent over one hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.

1



**SUB-1**

The OCCOG TAC review and analysis was discussed by the OCCOG Board at the January 23, 2020 Board of Directors meeting and serves as the basis for OCCOG’s comments.

The following general comments and recommendations are offered by OCCOG on the draft 2020 Connect SoCal Plan and PEIR and all associated appendices. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 1. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2020 Connect SoCal Plan, PEIR, and associated documents.

1

**Policy-Level Comments**

*1. Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research*

The OCCOG concurs with the comments identified by OCTA in its letter. OCTA has identified policy and technical issues related to the draft 2020 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

2

*2. High-Quality Transit Corridors (HQTCs) and High-Quality Transit Areas (HQTAs)*

The alignment of SCAG’s Regional Housing Needs Assessment (RHNA) and RTP/SCS documents are required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating “transit access.” OCCOG is concerned that the HQTAs as mapped in the draft RTP/SCS are inconsistent with SCAG’s definition for HQTAs. The draft RTP/SCS defines HQTAs as “generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.” The draft RTP/SCS further notes that SCAG based the definition on language in SB 375 which defines Major Transit Stops and High-Quality Transit Corridors (HQTCs). HQTCs are “corridor[s] with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.” The definition for HQTCs does not account for walkability.

3



SUB-1

OCCOG recommends revising the identification of HQTAs to reflect the nuance with certain HQTCs that fail to meet the “walkable corridor” characterization. Namely, HQTC segments operating on freeways are clearly not walkable and should be treated similar to rail transit service (i.e. as a Major Transit Stop).

**Recommendations: Correct the mapping of HQTAs to remove freeway-running HQTCs segments and treat applicable stops as Major Transit Stops for those segments operating on a freeway. To the extent practicable, align the definition of HQTAs used in the RTP/SCS and RHNA with the definition used for funding purposes by the Strategic Growth Council in disseminating cap and trade funding to ensure that the SCAG region is able to compete for available funds related to transit-oriented housing.**

3

*3. Process Concerns*

**Effective Use of the Technical Working Group** OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR, as well as the Regional Housing Needs Assessment (RHNA). We have repeatedly suggested that SCAG staff review the constitution of and reliance on the Technical Working Group (TWG) comprised of planning staff from SCAG member agencies and experts across the region. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies.

**Subject Matter Working Groups** In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan, but we are concerned that the manner in which these additional working groups were constituted. Their lack of interaction with the long-standing TWG does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and led to silos of information. Additionally, from a practical standpoint, working group meetings were held only in downtown Los Angeles and often included activities with breakout groups, which limited the ability of remote participants to effectively contribute or hear what is being discussed.

4

**Timeline Does Not Allow For Adequate Revision** In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2024



**SUB-1**

cycle to allow for a more robust review process that would ensure that comments being provided as part of the public comment period have the opportunity to be fully considered by SCAG staff and the policy committees, and stakeholders and jurisdictions have the opportunity to ensure that comments have been addressed prior to asking the Regional Council to adopt the final plan.

**Do Not Cut off Regional Council Discussion** Finally, OCCOG is concerned that the Regional Council agenda at the March 6, 2020 meeting when the Connect SoCal Plan is to be considered for approval is extremely crowded. It is our understanding that the agenda will also include a controversial item regarding the RHNA, as well as the RTP/SCS and PEIR; both topics require considered debate and are likely to generate discussion among policy makers. Given the manner the November 7, 2019 Regional Council meeting was conducted, with discussion being cut off to accommodate certain Regional Council members who had travel plans, we strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

4

**Recommendations:** Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees or even to the policy committees directly. Have liaisons from each subject-matter working group report out at the TWG so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2024 cycle and release drafts 6 months earlier to ensure that there is adequate time after the initial draft is released for SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted 2 hours for a meeting.

**4. Growth Forecast**

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

5

On December 11, 2019, CDR provided SCAG the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of Orange County jurisdictions so the final RTP/SCS growth forecast would accurately reflect entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities.





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CDR requested a copy of the final draft growth forecast dataset to confirm that all the technical corrections had been included in the final RTP/SCS growth forecast, but was informed on January 14, 2020 that SCAG would not provide a copy of the final draft growth forecast dataset to CDR for review until mid-February 2020. To simplify matters, it is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected.

5

We oppose any alternative in the PEIR that does not utilize local input or, at the very least, use the jurisdictional totals provided through the local input process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note that the failure to rely on accurate jurisdictional-level data divorces it from the methodology proposed in the RHNA as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final Connect SoCal Plan.

6

**Recommendations: OCCOG cannot yet support the adoption of the Connect SoCal 2020 RTP/SCS growth forecast at the jurisdictional level until we have been assured that the dataset has been corrected. OCCOG does not support the intensified land use scenario as presented in the Connect SoCal Plan, and recommends aligning the RHNA with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).**

*5. Remain Neutral on Technology*

Throughout the documents, there are specific examples of technology identified. It is not SCAG’s purview to pick winners and losers in technology; the marketplace will determine dominant technologies. Therefore, it should be noted that these are only examples and that future technologies should not be ignored or excluded from meeting the goals of the RTP/SCS. This will allow the document, including mitigation measures, to be more inclusive of and responsive to changing technological advances.

7

**Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG’s desire to facilitate and support innovation, but avoid naming specific technologies or providers (e.g., “TNCs” not “Uber and Lyft” or “zero emissions” instead of “electrification”).**



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6. *Maintain Unbiased, Objective Tone*

Language throughout the draft Connect SoCal Plan and PEIR and the associated appendices has a tendency to be leading and dramatic in its emphasis of certain key issues, such as active transportation, public health, and land use policy. While these issues are important, using opinion-based and emotionally-charged language is inappropriate in this context.

8

**Recommendation: SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.**

7. *“Can and Should”*

As indicated in the PEIR, state law provides that it is appropriate to indicate in mitigation measures that they “can and should” be implemented where the authority to implement the measures rest with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies’ regulatory measures. OCCOG recognizes SCAG’s use of the words “can and should” are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies’ land use authority, OCCOG deems inappropriate any language seemingly imposing affirmative obligations contrary to SB 375 inappropriate. As such, the use of the language “can and should” for mitigation measures addressed to local agencies is overreaching.

9

**Recommendation: Change language in all project level mitigation measures to read “~~can and should~~ consider where applicable and feasible.” This change will clarify that the project level mitigation measures are a menu of options.**

8. *Duplicative/Existing Regulations*

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Mitigation measures should address only those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change

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over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

10

*9. Cities vs. Jurisdiction*

Throughout the 2020 RTP/SCS, PEIR, and associated appendices, there are references to “cities”. Since the SCAG region also includes counties, it is recommended that references to “city” or “cities” are changed to “jurisdiction” or “jurisdictions” where appropriate.

11

**Recommendation: Change references to “city” or “cities” to “jurisdiction” or “jurisdictions” where appropriate.**

*10. Spell out Acronyms Prior to Using Abbreviations*

There are many different abbreviations used throughout the documents. To avoid confusion and help persons unfamiliar with technical jargon, spelling out the acronyms prior to using them for the first time is common; however, this is often missing in the Connect SoCal documents.

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**Recommendation: Spell out the words in an acronym first before using it. Include a glossary for common acronyms and jargon definitions in the appendices for each technical report.**

*11. Provide Sources for All Graphics and Tables*

When a report of such complexity as the Connect SoCal Plan is produced, it is common for tables, maps, and other graphics to be used or referred to in a manner that could divorce them from the context in which they are presented. For instance, someone may come upon a chart that explains a topic they are researching and could download the image separate and apart from the technical explanation accompanying it in the electronic version of the document. Without source information embedded in the graphic, information can be spread without proper attribution. We understand that it may “look cleaner” to not include a source, date, and citation for data but best practices for technical reports include adding sources to all graphics.

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**Recommendation: Make it a SCAG style guide policy to include the source and date of all data used in tables, charts, maps, infographics etc., included in technical reports.**

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*12. Fees and Taxes*

Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, therefore, it should not be assumed that they will be approved.

**Recommendations: a) Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. b) Clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.**

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**Conclusion**

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2020 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline adopted in the past two cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the extended public comment period, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2020 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

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We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have a RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do



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not hesitate to contact me or Marnie Primmer, OCCOG Executive Director at (949) 698-2856 or marnie@occog.com.

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Sincerely,

  
Stacy Berry, Chair of the Board

*Stacy Berry*

Chair

Orange County Council of Governments

Cc: OCCOG Member Agencies  
OCCOG Board of Directors  
OCTA Board of Directors  
TCA Board of Directors



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*Table 1. 2020 RTP/CONNECT SOCAL COMMENTS*

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2020 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.
2	General Comment	All All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.



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#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	General Comment	All All documents	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
4	General Comments	All All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
5	General	RTP	Clearly define what the development pattern is for the SCS.
6	General Comment	All maps growth forecast data	Add:  <u>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2020 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project's consistency with the 2020 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA)."</u>
7	General Comment	All documents	<p>SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding the key implementation factors of new transportation user fees, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Technology and associated privacy issues,</li> <li>• Cost of implementation and administrative methods for fee collection/revenue allocation,</li> <li>• Equity concerns and exemptions/credits, as applicable,</li> <li>• Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions, including GHG emissions, and</li> <li>• Economic assessment.</li> </ul> <p>SCAG staff should also evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms, including local option sales tax measures, express lanes and toll facilities, and consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>

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#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
8	General Comment	All documents	SCAG staff should provide regular updates to its Transportation Committee and Regional Council regarding both the CHSR Project and the Metrolink SCORE Program. Additionally, SCAG staff should assist Metrolink and the CTCs in detailing implementation steps for the SCORE Program, including securing new revenue sources to support operations at the levels assumed in the plan.
9	General Comment	All documents	The 2020-2045 RTP/SCS should recognize that the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. Furthermore, the 2020-2045 RTP/SCS should clearly recognize that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.
10	General Comment	All documents	The 2020-2045 RTP/SCS should clearly state that the regional strategies suggest improvements beyond the projects submitted by OCTA, and that the implementation of the strategies is subject to availability of new revenue sources and the necessary project development and review processes by the implementing agencies.
11	General Comment	All documents	Maps & other graphics- fonts need to be embedded in PDF to print properly.
12	General Comment	All documents	All tables, charts, graphics need to have sources and the document title
13	General Comment	All documents	The RTP/SCS focuses on housing costs and homelessness throughout the document. While this topic is regionally significant, it is not a requirement of SB 375. The focus of SB 375 is to reduce greenhouse gas emissions from light duty passenger vehicles through coordinated transportation and land use planning. While a co-benefit of this effort may be an increased housing supply, it should not be a focus of the plan. Additionally, addressing homelessness is not a requirement of SB 375 and should not be part of the narrative.
14	General Comment	All documents	The growth forecast should be adopted at no lower than the jurisdictional level

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#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
15	General comment	All documents	In multiple documents, there is a discussion of variable speed limits, but little information on the ability for them to be enforced. The documents refer to a program in Seattle where variable signs are installed that lower speed limits in advance of congested areas, accidents, bad weather, or other situations where speeds would be reduced. It is unclear if such a program would be enforceable in California at this time, since speed limits are generally set using the 85% rule. At least the technical studies should highlight what or if there are any legislative actions that are needed to implement this concept.
16	Define	In RTP main document	Add the following to the glossary; use definitions from PEIR  Households  Absolute constraints  Single-family  Multi-family  Constrained/strategic  Unconstrained plan
17	Clarification	p. 61	What was the performance of the 2016 RTP? (A summary of the 2016 RTP/SCS Progress provided in the SCS Technical Report (p8) should be provided in the Main document). Where are we as a region and what still needs to be done in order to meet the region’s 2020 goal? There was no initial summary at the beginning of the report, which would have been helpful.
18	Clarification	p. 2, column 2, paragraph 1	“...but also by bringing housing <del>closer to</del> and jobs <u>closer together</u> , making commutes shorter and making it easier to get around without a car.”
19	Correction	p.4, paragraph 3; All documents  PEIR ES-4, P2.0-10  PLAN p96, p113	Ensure revenue totals are consistent throughout all documents  Expected revenues not consistently reflected in the Plan and PEIR. <b>\$633.9 billion cf. \$638.6 billion</b>

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#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Core Vision	p. 4, paragraph 1, last sentence.	<p>“We will locate housing, jobs and transit closer together in priority growth areas while preserving natural lands and open spaces.”</p> <p>Goals may conflict in coastal areas, e.g., San Clemente HQTAs. Clarify what the priority will be.</p>
21	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Core Vision	Differentiate the following text with formatting and/or spacing: “Progress and next to advance the Core Vision can be found throughout Chapter 3”. Otherwise, it appears to be part of the Core Vision.
22	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Key Connections	Differentiate the following text with formatting or spacing: “Key connections can be found in Chapter 3”. Otherwise, it appears to be part of the Key Connections.
23	Correction	p. 5; column 2; Connect SoCal Plan Summary; Economic Impact	For direct and indirect jobs, consider displaying in thousands to be more consistent with other figures listed. Also, missing “per year” notation as these are average annual jobs.
24	Clarification	p. 5; column 2; Connect SoCal Plan Summary; Plan Benefits	Verify figures as it does not appear to be consistent with the Performance Measures Technical Report.
25	Clarification	p. 8; right column; Laws that guide the Plan; 1 <sup>st</sup> bullet	Verify that the reference be to U.S.C., as in United States Code.
26	Clarification	p. 10, column 2, paragraph 5	“The process was <del>informed</del> <u>guided</u> by the Connect SoCal Guidelines and Schedule...”

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#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
27	Clarification	p. 11, column 1, paragraph 3	<p>“This effort culminated in a comprehensive update to the capital list of projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional projects that are intended to address challenges that are regional in nature.”</p> <p>Requested edits:</p> <p>“SCAG worked closely with each of the six county transportation commissions throughout 2018 to update the list of <u>regionally significant</u> <del>major local</del> transportation projects that was established in Connect SoCal’s predecessor, the 2016 RTP/SCS. Each county transportation commission in turn worked with their partner transportation agencies (including <u>applicable</u> transit providers, rail operators, marine port and airport authorities and Caltrans District offices) to finalize a list of county-priority projects to submit to SCAG. This effort culminated in a comprehensive update to the <del>capital</del> list of <u>programs and</u> projects, which numbers in the thousands. SCAG worked collaboratively with key stakeholders to identify additional regional <del>projects</del> <u>initiatives that go beyond county-level commitments and</u> are intended to address challenges that are <u>uniquely</u> regional in nature.”</p>
28	Correction	p.11, column 1, paragraph 4; 5 <sup>th</sup> line	Replace “New Mobility” with “Mobility Innovations”
29	Define	p. 11, column 1, paragraph 4	<p>“...SCAG’s planning process, and helped develop a vision for the future that promotes regional goals and sustainability while respecting local control.”</p> <p>Define ‘respecting local control’.</p>
30	Clarification	p. 11, column 2, paragraph 2	<p>“SCAG’s 18 CBO partners represented constituents from...”</p> <p>In the document, list the CBOs. Explain how these were chosen and when the workshops were held. If this is listed in the Public Participation &amp; Consultation Technical Report- state this as where to refer to.</p>

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#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
31		p. 11, column 2, paragraph 3	“Feedback received through our CBO partners was used to identify areas where the plan could be refined to meaningfully reflect the priorities and concerns of these traditionally underserved groups, particularly because they <u>have historically been</u> <del>are</del> disproportionately burdened by the negative outcomes associated with existing and changing land use patterns and transportation policies.”
32	Clarification	p. 12, column 1, paragraph 3	“SCAG <del>used</del> <u>considered</u> input gathered through the CBO engagement and public workshops...”
33	Correction	p. 13; column 2	Economic & <u>Job Creation Analysis</u> <del>Jobs Forecast</del>
34	Clarification	p. 19, column 1, paragraph 2	<p>“In the years ahead, the region may face significant challenges from technology disruption by reducing opportunities for many regional workers who will not be able to close the skills gap to adequately compete for future jobs in that sphere. <del>This has spurred increasingly popular policy discussions of universal basic income (UBI) as a potential solution to offset the negative impacts of job losses due to technology. Since employment is becoming less necessary for gains in overall economic productivity, one UBI model might involve redistributing the revenues from higher taxes on businesses utilizing these new platforms to area residents to ensure a minimum living standard without impacting the incentive to work.</del>”</p> <p>Delete as UBI is not under purview of SCAG or RTP.</p>
35	Clarification	p. 19; column 1; paragraph 3	Note that sales tax measures fund not only future transportation infrastructure but also help to maintain the existing transportation system.

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#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
36	Clarification	p. 21, column 2, paragraph 1	<p><del>While the</del> There has been an acceleration in new units since the Great Recession <u>that</u> has been characterized by a higher share of multi-family units, <del>there is concern that this trend may reverse absent policy intervention, as Millennials seek affordable ownership opportunities which that are scarcer in the urban core and in the multi-family market.</del> For example, 51% of all new housing units issued in California for 2018 were for single-family dwellings, making 2018 the first year since 2011 that single-family housing construction outpaced multi-family home production..."</p> <p>Maintain objective and unbiased tone. Please clarify whether the topic is the number of units that were permitted or the number of housing units that were constructed.</p>
37	Clarification	p. 23, column 1, paragraph 2	<p>"Between 2008 and 2016, less than six percent of household growth and less than five percent of employment growth occurred in open space areas."</p> <p>Clarify if development occurred in open space or on underutilized, undeveloped, or vacant land.</p>
38	Transportation System	p. 29, third bullet	<p>"Non-Hispanic Whites disproportionately use automobiles and bicycling modes..."</p> <p>Referring to Table 2.2, 38.9% compared with 36.2%, and 37.6% compared to 37.5% does not seem disproportional.</p> <p>Perhaps the sentence should say "Non-Hispanic Whites and Hispanics disproportionately use automobiles and bicycling modes..."</p>
39	Clarification	p. 32, column 1, paragraph 3	<p><del>...environmental litigation, community resistance to all kinds of housing medium and high density projects, and lack of sufficient local funding mechanisms."</del></p> <p>Resistance is not limited to only higher-density housing projects.</p>
40	Clarification	p. 32, column 2; paragraph 2	Add source for the economic benefits of new housing construction.

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#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 33, graphic	"...environmental litigation, community resistance to <u>all kinds of housing medium and high density</u> projects, and lack of sufficient local funding mechanisms and lack of sufficient <u>state, federal, and</u> local funding mechanisms."
42	Clarification	p.36	<p>Under "Farm Land Lost and At Risk", SCAG states that 78 percent of Orange County land utilized for farming has been lost since 1984. It should be noted that <b>not all land used for farming was permanent farmland</b> and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add note to table and section that "<b>not all land used for farming was permanent farmland</b> and was not necessarily designated in the zoning code or general plan for farming."</p>
43	Clarification	p. 39, graphic	<p>"If a person lives in housing adjacent to a freeway, they may be more likely to develop asthma."</p> <p>What about high capacity arterials like HQTAs or railines? Why are these not included?</p>
44	Clarification	p. 41, column 1, paragraph 2	Provide reference to Congestion Management Technical Report.
45	Clarification	p. 46, column 2, paragraph 2	"This plan is not designed to dictate local actions and policies, but rather to lay out a path to achieving regional goals <u>set by the Regional Council.</u> "
46		p. 58 column 1, paragraph 2	RAMP- How would this work? Would there be any endowment funds required? Who can/cannot participate?
47	Clarification	p. 48, column 2, paragraph 3	"...Connect SoCal can reach the <u>regional</u> target of reducing greenhouse gases..."

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#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
48	Clarification	p. 49, column 1, bullet 2	“Focus on a <u>regional</u> jobs/housing balance to reduce commute times and distances and ...”
49	Sustainability Communities Strategies	p. 49, column 2, fifth bullet	“Support statewide legislation that reduces barriers to new construction...”  Considering coupling this with or replacing this with “Increase statewide funding to construct affordable housing”
50	Clarification	p. 50, column 1, paragraph 1	“Although center-focused placemaking can be applied in a wide range of settings, priority must be placed, however, on urban and suburban infill, in existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, known as “Spheres of Influence,” where applicable and feasible.”
51	Clarification	p. 50, column 2, paragraph 4	“Employment growth and residential growth are prioritized in Job Centers in order to leverage existing density and infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
52	Green Region	p. 55, column 1, first sentence	“... in areas subject to future two-foot sea level rise.”  Cite the source used. Indicate where map is showing sea level rise and HQTAs.
53	Clarification	p. 56, paragraph 1	“The Regional Housing Supportive Infrastructure strategy will help make it quicker for <u>developers</u> <del>local jurisdictions</del> to produce critically-needed housing.”  Local jurisdictions don’t build housing.
54	Clarification	p. 59; column 1; paragraph 1; last sentence	It would be appropriate to include investment in regionally significant local streets and roads here too.



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#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
55	Correction	p. 59; column 2; paragraph 3	"The <del>Plan plan</del> includes \$68 billion towards preservation, operation and resiliency needs of the state highway system, and <del>\$47.5 \$20.88</del> billion towards preservation, operation and resiliency needs of the <u>regionally significant</u> local <u>streets and</u> roads.
56		p. 60, column 2, paragraph 3  p. 62	Go Zones- specify that Go Zones should be up to jurisdictions and local CTCs to establish. Not opposed to Go Zones in concept.
57	Clarification	General Comment, p.61, 102	"A mileage-based system."  For all references to a mileage-based user fee, specify that this is intended by SCAG to replace the gas tax, not be an additional fee.
58	Clarification	p. 64, column 1, paragraph 1	"Connect SoCal <del>commit</del> identified \$7.3 billion through 2045 to implement TDM strategies throughout the region."
59	Clarification	p.64, column 1, paragraph 3	Revised to clarify that TSM is more than ITS.
60	Active Transportation	p. 71, column 1, paragraph 3, last sentence	Communities are excited about changing our streets. We need support in the form of funding to do so.
61	Core Vision Complete Streets	p. 71, column 2, paragraph 4	"Planning for 2045...grant funds for regionally significant projects."  Planning for 2045, especially for the Core Vision of Complete Streets, should include funding for non-motorized projects, such as widened sidewalks and bike lanes to close gaps in the pedestrian and bicycle regional networks.
62	Correction	p. 73; column 2; paragraph 2	"auxiliary lanes, general purpose lanes, carpool lanes, <del>toll lanes</del> and Express/HOT"  Toll lanes are not mentioned on either table or exhibit referenced.
63	Correction	p. 74, column; paragraph 1	"believes merits future consideration for <u>potential</u> inclusion in the financially constrained"
64	Correction	p.74; column 2	"the <u>I</u> -105 in Los Angeles County..."

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**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
65	Correction	P. 84	Under the <i>Right Tool for the Job</i> , first paragraph. The rise of shared mobility and mobility as a service will allow residents <u>to</u> choose how to travel...
66	Clarification	p. 83, column 1, paragraph 3	“Project level mitigation measures have been identified that “can and should <u>where applicable and feasible</u> ” be undertaken by lead agencies that implement transportation projects...”
67	Clarification	Exhibit 3.4, Exhibit 3.6	Verify the location of job centers on these figures as it does not appear to match.
68	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Note states that areas precluded from growth include 2 ft Sea Level Rise areas. However, SLR is does not appear to be indicated on Exhibit 3.4. SLR will likely be a small, hard-to-see line on the map. Please include the SLR areas in a technical report.
69	Growth Constraints	Exhibit 3.4, Exhibit 3.5	Growth constraints should include historic resources listed on (at least) state and federal lists.
70	Revenue Sources	p. 107, Table 4.4 first row	Local jurisdictions would be responsible for implementing parking pricing in major job centers to support \$77.8 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by implementing parking pricing in the next 15 years given that: <ul style="list-style-type: none"> <li>• Job centers have existing tenants and local jurisdictions do not want to encourage the tenants to leave by imposing additional costs, and</li> <li>• There is little to no infrastructure to support alternative modes of transportation.</li> </ul>
71	Revenue Sources	p. 107, Table 4.4 second row	Local jurisdictions would be responsible for EIFD formation and TIF to support \$3 billion in revenue for the RTP/SCS. It seems wrong to assume that local jurisdictions will bring in revenue by forming EIFDs.
72	Correction	p. 108, Table 4.5.1 first row	“Locally imposed <u>½ percent</u> sales tax in four counties (Imperial, Orange, Riverside, and San Bernardino). Permanent 1 percent (combination of two <u>½ percent</u> sales taxes)...”
73	Correction	p. 108, Table 4.5.1 second row	“The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> sales tax on ...”
74	Correction	p. 108, Table 4.5.1 fourth row	Suggest deleting “(in core revenue forecast)” since a toll revenue source is not included in the reasonable available sources.

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**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
75	Revenue Sources	P. 108, Table 4.5 fifth row	Does the assumption of \$2.5 billion in revenue from impact fees account for projects that are exempt from impact fees? One example is ADUs of less than 750 sf are exempt from impact fees.
76	Clarification	p. 111, Table 4.5.4 second row	Indicate if the mileage-based user fee would be inflation adjusted.
77	Expenditures	p. 114, Table 4.6.2 row 9	Active Transportation expenditures total \$17.7. Note with * says total is \$22.5 billion.  This asterisk should have been placed with “Regionally Significant Local Streets and Roads *”
78	Clarification	p. 118, column 1, paragraph 3	“...that comprise the SCAG region. <u>With the Plan, in this scenario,</u> trips to work, schools and other...”
79	Clarification	p. 118, column 2, bullet 7	“... Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the requisite urban infrastructure. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> ”
80	Clarification	p. 120, bullet 2	Consider a closer linkage to the definition of Baseline in the glossary. For instance, a project programmed in the 2019 FTIP should not automatically be considered as Baseline.
81	Clarification	p.121	Replace “Trend” with “Baseline”.
82	Clarification	p.122	Note is misleading as it is different than what have been defined elsewhere—particularly in the Glossary.
83	Clarification	p. 123, last 2 trends	Correct trend arrows in the last two rows.
84	Clarification	p.124, Table 5.1	For successful Mobility & Accessibility outcomes, do we need to measure the miles and/or percent of gap closures for non-motorized travel such as SR2S and bike routes/lanes?



**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
85	Clarification	p.124, Table 5.1	For Travel time distribution by mode, the Definition should include “(work trips)” because the 2045 Performance Results show the % for only work trips. Also, the % for HOV trips do not match the % shown in the Performance Measures Technical Report.
86	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for fatality rate and serious injury rate appear to be reversed.
87	Clarification	p. 125, Table 5.1	For the Baseline and Connect SoCal measurements of Cardiovascular disease rate, the table should show percentages in tenths, just like the other measurements, and the trend should show no change.
88	Clarification	p. 125, Table 5.1	Connect SoCal 2045 Performance Results for active transportation mode share for walk share (all trips) and bike share (all trips) are not consistent with the Performance Measures Technical Report and the Active Transportation Technical Report.
89	Clarification	p. 126, Table 5.1	Asterisked figures are associated with GHG emissions, which are not criteria air pollutants. Suggest moving asterisks to Baseline criteria pollutant emissions.
90	Clarification	p. 126, Table 5.1	For the Economic Opportunity outcome group, why does the objective state and improvement over baseline when baseline data is not available? How can you measure improvement without a baseline?
91	Clarification	p. 127, Table 5.1	Investment Effectiveness should be measured by investment per mode. What is the investment benefit/cost ratio for goods movement? What is the investment benefit/cost ratio for transit? What is the investment benefit/cost ratio for passenger rail? What is the investment benefit/cost ratio for active transportation?
92	Clarification	p. 131, Figure 5.3	Title appears to be missing “, Thousands”.
93	Clarification	p. 132, column 1, paragraph 1	Verify listed values for mean commute time as they appear to be inconsistent with those shown in Public Health Technical Report.
94	Clarification	p. 133, column 2, paragraph 2	The indicated five percent improvement is inconsistent with values shown elsewhere, including the Public Health Technical Report.
95	Clarification	p. 134, column 1, paragraph 3	Reductions in health care expenditures is not in itself an economic opportunity—the potential economic activity associated with expenditure of the health cost savings on other things should be considered here.



**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
96	Clarification	p. 135, column 1, paragraph 3	Suggest replacing "\$312 billion" with "\$316 billion"  Suggest removing the reference to Transportation Safety and Security Technical Report.
97	Clarification	p. 135, column 2, paragraph 2	"Since most new development would be directed into areas where urban infrastructure already exists, there will not be as much need to extend or build new local roads, water and sewer systems and parks. <u>However, it is recognized that infrastructure capacity, services, and other amenities may need to be evaluated to assess the potential for increasing density to determine if the existing infrastructure, services, and amenities would need to be expanded to accommodate additional growth.</u> "
98	Clarification	p. 136, Table 5.3, row 1	Suggest including a note: Capital, operations and maintenance costs referenced here include costs beyond those for transportation (e.g., sewer and water operations and maintenance costs) as identified in Chapter 4.
99	Clarification	p. 141, column 2, paragraph 2	Accessibility to Parks & Schools:  <del>"In support of the Connect SoCal EJ assessment, analysis was conducted to evaluate accessibility to the San Gabriel National Monument. SCAG's accessibility analysis seeks to determine how the Plan improves residents' ability to access parks within a designated travel time and distance. See Environmental Justice Technical Report for detailed analysis on accessibility."</del>  Some state parks are served by transit e.g., Crystal Cove.  Why is the example LA-centric? Why only San Gabriel Monument? Reword to suggested above.
100	Clarification	p.141, column 2, paragraph 2	"Accessibility parks and schools"- what happens when RHNA or numbers are so large you have to rezone open space? Local open space isn't protected or valid excuse accepted by HCD as land/reason for not rezoning

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**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
101	Clarification/ Correction	p. 142, column 2, item 9	Verify centerline miles and lane miles as figure appear to be inconsistent with Highways and Arterials Technical Report, Environmental Justice Technical Report and Transportation Conformity Technical Report.  "It also includes one of the country's most extensive HOV systems and a growing network of toll lanes, including HOT lanes."
102	Clarification	p. 143, column 1, item 15	"Sales and gasoline taxes, which are <u>currently</u> the primary sources of funding for the region's transportation system, were evaluated for the purposes of this analysis."
103	Clarification	p. 143, column 2, item 16	"The strategies that public agencies pursue to invest in transportation systems presents a <u>potential</u> substantial impact on EJ."
104	Clarification	p. 143, column 2, item 18	This should be updated to also account for the local road charge program.
105	Clarification	p. 144, paragraph 4, first sentence.	"The overall objective of Connect SoCal is to provide a means to transform the SCAG region in accordance with the vision provided by our constituent communities and jurisdictions."  Connect SoCal is not in accordance with the vision of all of the constituent jurisdictions . . .  Who are the 'constituent communities'?
106	Clarification	p. 147, Table 5.4, last row	This should be updated to also account for the local road charge program.
107	Clarification	p. 151, column 1, paragraph 3	"These funds will be used to develop a Regional Housing Strategy Framework and provide planning grants and services to jurisdictions to implement their 6th cycle RHNA allocation which is supportive of Connect SoCal goals and policies."  What is the Regional Housing Strategy Framework?  How much money will be provided to jurisdictions?  Will the funding distribution methodology be consistent with the RHNA distribution methodology?



**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
108	Correction	p. 163, glossary	<p>“Measure A Revenues generated from Riverside County’s local half-percent sales tax.</p> <p>Measure D Revenues generated from Imperial County’s local half-percent sales tax.</p> <p>Measure I Revenues generated from San Bernardino County’s local half-percent sales tax.</p> <p>Measure M Revenues generated from Orange County’s local half-percent sales tax. Also refers to Los Angeles County’s local half percent sales tax which was authorized in 2018.</p> <p>Measure R Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
109	Correction	p. 166, glossary	<p>“Proposition A Revenues generated from Los Angeles County’s local half-percent sales tax. ...</p> <p>Proposition C Revenues generated from Los Angeles County’s local half-percent sales tax. ...”</p>
110	Clarification	p. 173, glossary	<p>“VMT Vehicle Miles Traveled – On highways , a measurement of the total miles traveled by all vehicles in the area for a specified time period. It is calculated by the number of vehicles times the miles traveled in a given area or on a given highway during the time period. In transit, the number of vehicle miles operated on a given route, or line, or network during a specified time period.”</p> <p>Indicate if VMT is only for highways or if streets, freeways, and toll road miles travelled are also included.</p>
111	Correction	p. 177,	Economic & <del>Job Creation Analysis</del> <del>Jobs Forecast</del>

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Table 2. PEIR COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	All mitigation measures	Mitigation measures should not be prescriptive but be deferred to the applicable resource/trustee agency involved (e.g. US Fish and Wildlife Service or California Department of Fish and Wildlife for Biological Resources; US Army Corps of Engineers or Regional Water Quality Control Boards for water Quality, AQMD for Air Quality etc.)

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**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION	
2	Correction	ES-4	Second bullet. Details a regional transportation investment given <del>\$633.9</del> <b>638.6</b> billion in expected revenues from federal, state, regional and local sources over the next 25 years; and ...	19
3	Clarification	ES-10, bullet 3	“Establish a mileage-based user fee <u>to replace the gas tax and to generate</u> a funding source for aging infrastructure and construction of other travel options”	20
4	Clarification	ES-11	Highway and Arterial Network. Toll roads such as those operated by the TCA in Orange County are distinct from toll lanes, express or HOT lanes. Suggest modifying the following sentence to clarify this distinction. “Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll <b>roads, toll</b> lanes and Express/HOT lanes.”	21
5	Clarification	p.2.0-23-25	AIR QUALITY MITIGATION MEASURES. Defer to AQMDs or local jurisdictions’ planning/zoning regs.	22
6	Clarification	p.2.0-20	PMM AES-3 (b). <i>Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m.</i>  This is too prescriptive and could conflict with regulations/ordinances already in place at the local jurisdiction level. Projects should be required to comply with applicable local jurisdictions’ codes, planning and/zoning ordinances that cover light pollution (e.g., dark skies ordinances etc).	23
7	Clarification	ES-5 Table Air Quality Impact AQ-1 (pages 2.0-23)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.	24
8	Clarification	p.2.0-24	PMM-AQ-1. Reference should be made to AQMD regs e.g., rule 403 Fugitive Dust.	25
9	Clarification	p.2.0-25	PMM-AQ-1 q). Ref to AQMD regs regarding sensitive receptors	26
10	Clarification	p.2.0-25	BIOLOGICAL RESOURCES MITIGATION MEASURES. Reference should be made to permitting coordination/measures as will be negotiated with the resource agencies. Refer also to local regs.	27
11	Clarification	ES-5 Table Impact AQ-4	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to	28



**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		(pages 2.0-25)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.
12	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
13	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
14	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
15	Clarification	p.2.0-29	PMM-BIO 3 d). In some instances, Nationwide Permits have been revoked and replaced with County Special Area Management Plans (SAMPs), which have letters of permission procedures that should be referenced instead, if applicable.
16	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”
17	Clarification	p. 2.0-31	<b>Congestion Pricing.</b> Connect SoCal identified three congestion pricing strategies, <b>two of which were</b> incorporated into the 2012 and 2016 RTP/SCS. (Which two and how did they perform? It would be helpful to know if the measures previously implemented were effective or if new measures/adjustments are required)

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**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	Table ES-5 p. 2.0-32	"PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency."
19	Clarification	Table ES-5 p. 2.0-33	"PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
20	Clarification	Table ES-5 p. 2.0-34	"PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
21	Clarification	p. 2.0-35	<b>Highway and Arterial Network.</b> Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, <b><u>toll roads</u></b> , toll lanes and Express/HOT lanes.
22	Clarification	Table ES-5 p. 2.0-36	"PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
23	Clarification	Table ES-5 p. 2.0-37	"PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
24	Clarification	ES-5 Table Geology and Soils	"Less than Significant" impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to

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**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION	
		Impact GEO-1 (pages 2.0-37)	include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.	41
25	Clarification	ES-5 Table  Geology and Soils  Impact GEO-3 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.	42
26	Clarification	ES-5 Table  Geology and Soils  Impact GEO-4 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.	43
27	Clarification	ES-5 Table  Geology and Soils  Impact GEO-5 (pages 2.0-38)	“Less than Significant” impact conclusions should be re-evaluated to substantiate the conclusion of less than significant with no mitigation measures needed and/or consider changing the impact conclusion to include mitigation measures and include language to note that project specific measures would be included as applicable and feasible.	44
28	Clarification	Table ES-5  p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	45
29	Clarification	Table ES-5  p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	46
30	Clarification	Table ES-5	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project	47



**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		p. 2.0-57	can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
31	Clarification	Table ES-5 p. 2.0-64	"PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
32	Clarification	Table ES-5 p. 2.0-66	"PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:"
33	Clarification	1.0-4, paragraph 3	"... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees..."  All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.
34	Clarification	3.11-12, paragraph 1	<del>"City and county general plans must be consistent with each other."</del>  This statement is not accurate. Delete.
35	Clarification	3.11-32, paragraph 1	"Regional Housing Needs Assessment  ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region's existing and projected housing need.35 HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the

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**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>region’s housing need.<sup>36</sup> HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.<sup>37</sup> <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>
36	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>
37	Clarification	3.11-32, paragraph 4 & 3.14-14, paragraph 2  3.11-39, paragraph 2	<p>“In addition, the housing element defines the related policies and programs that the community will implement in order to achieve the stated goals and objectives. This would be accomplished through the <b>allocation</b> of regional housing needs consistent with the Plan.”</p> <p>“...To address this, the analysis in the PEIR covers overall impacts of transportation projects and land use strategies described in the Plan and evaluates how conditions in 2045 under the Plan would differ from existing conditions...”</p> <p>“<sup>23</sup>Connect SoCal and this PEIR address reasonably foreseeable households in the SCAG region...”</p>

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**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		3.14-16, footnote 23  3.14-22, paragraph 4	<p>“Generally, most jurisdictions have started planning for this increase in density in urban areas and the Plan builds on local input (and is not intended to result in re-designation of areas where such re- designation is not approved by the local agency). However, there remains the potential for the Plan’s strategies to influence population growth in areas where local general plans have not yet been updated to reflect such growth. Therefore, implementation of the Plan would have the potential to induce unplanned growth in some areas of the region resulting in a significant impact, requiring mitigation measures.”</p> <p>In this context, does ‘allocation’ refer to the jurisdictional number calculated through the disaggregation of the regional total to the jurisdiction or the geographic distribution and calculations of the RHNA methodology that were used to disaggregate the regional total?</p> <p>Does a jurisdiction have to site and zone for housing consistent with the Plan?</p> <p>If the update to the housing element includes a RHNA allocation that is reflective of both existing and projected housing need, how can the allocation of regional housing needs be consistent with the RTP/SCS if the jurisdiction’s RHNA number is significantly different than its growth forecast total?</p> <p>Jurisdictions are required to zone for the amount of housing units prescribed to them through the RHNA process. A large portion of the 6<sup>th</sup> cycle allocation is due to existing need, which comes from pent-up demand from existing overcrowding and cost burdenness. By zoning for the RHNA allocations and developers building those units, those units would become occupied (households) because new housing would be available at required income ranges and would therefore be attainable. Furthermore, it is reasonable that these housing units will be occupied, creating ‘households’, throughout the SCAG region. Since these new housing units, which would ultimately become households that coincide with a healthy market vacancy rate prescribed by the state, were distributed and not constrained to jurisdictional-level forecasts, the RHNA</p>

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**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.
39	Clarification	3.11-33, paragraph 3	“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <u>Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
40	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment  ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.15 <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”
41	Clarification	3.14-15 (paragraph 2)	“Per SB 375, the <b>projected</b> needs portion of the 6 <sup>th</sup> Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”

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**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			Question – Will the existing needs portion of the 6 <sup>th</sup> Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?
42	Clarification	3.14-16 (paragraph 1)	<p>“The SCS must accommodate the <b>projected</b> need portion of the 6<sup>th</sup> cycle RHNA.”</p> <p>Government Code Section 65080(b)(2)(B) states that “the SCS shall...(ii) identify areas within the region sufficient to house all the population of the region, including all segments of the population, over the course of the planning period of the regional transportation plan...[and] (iii) <b>identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region</b>...[and] (iv) identify a transportation network to service the transportation need of the region...[and] (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks...”</p> <p>“While the <b>existing</b> housing need portion of the 6<sup>th</sup> cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.”</p> <p><i>This is an extremely vague analysis for an estimated 900,000 housing units of existing need. Given that RHNA is required to be consistent with the SCS, the PEIR should provide a more robust analysis of the growth forecast that complies with the Government Code requirements for the SCS.</i></p>
43	Clarification	Page 3.11-32, First Paragraph, Last Sentence	<p>“HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.”</p> <p>Correction – HCD’s determination is supposed to be based on population projected and produced by DOF and regional population forecasts;</p>

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**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			however, HCD has chosen to ignore Government Code Section 65584.01(a), which requires that if the COG’s growth forecasts are within 1.5% of the DOF growth forecasts, then the COG’s forecasts shall be used for RHNA purposes. Instead HCD has chosen to use the DOF growth forecasts.
44	Clarification	3.11-33 (paragraph 2), Last Sentence	<p>“The RHNA does not necessarily encourage or promote growth...” This sentence is false. Government Code Section 65584(a)(2) states, “It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).</p> <p>In fact, the housing growth (both from projected and existing need) should occur based on the RHNA allocation plan.</p>
45	Clarification	3.11-33 (paragraph 4)	Government Code Section 65584.01(C) and (H) define overcrowding and cost-burdened households. It is important to note that the law allows for these rates to be based on “comparable housing markets...as determined by the COG.” Although SCAG has identified different rates, HCD has ignored the law that allows SCAG to determine these rates based on comparable housing markets.
46	Clarification	3.11-33 (last paragraph, last sentence)	<p>“Per SB 375, the projected needs portion of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.”</p> <p>Question – Will the existing needs portion of the 6th Cycle RHNA be consistent with the Connect SoCal for the comparable period? Since the RHNA is supposed to address both existing and projected housing need, what growth pattern is assumed in Connect SoCal to address the existing need?</p>

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**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
47	Clarification	p. 3-20-6-7	The approx. 38,000-acre Orange County Central-Coastal Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan should be mentioned here.

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*Table 3. ACTIVE TRANSPORTATION TECHNICAL REPORT COMMENTS*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 42; Figure 27	Suggest replicating figure from cited source as this graphic does not convey the message as effectively.
2	Correction	p. 44; column 2; current bikeway network; 1st sentence	This is somewhat misleading as both Los Angeles and Riverside counties are substantially larger than Orange County. As a share of countywide lane miles, Ventura and Orange counties have more bikeways.
3	Correction	p. 49; column 1; Cities and counties; 2nd paragraph; 1st sentence	This is not an accurate statement as the funding in Orange County is significantly below the share of the region's population.
4	Clarification	p. 57; column 2; Table 8; 2045 Connect SoCal average commute time walking	Verify figure as it does not appear to consistent with the Public Health Technical Report.
5	Clarification	p. 58; column 2; Table 9	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book and Performance Measures Technical Report.
6	Clarification	p. 63; column 1; Technology and micro-mobility strategies; 1st bullet	Is this an example or the regional standard?

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**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 65; Table 10; Total	Check the math or include note that it does not sum to the total due to rounding.
8	Clarification	p. 67; column 1; Actions for technology and micro-mobility; 1st bullet	Why only Caltrans?
9	Correction	p. 68; column 1; Strategic Plan; 1st paragraph	Suggested edit:  Connect SoCal contains approximately \$22.5 billion (in nominal dollars) in investments in active transportation between 2020 and 2045. However, this represents only a portion of the need, based upon reasonably available funding.
10	Clarification	p. 68; column 1; Strategic Plan; 3rd paragraph; 1st sentence	Clarify if this is in addition to the \$22.5 billion included in the constrained plan.
11	Clarification	p. 68; column 2; Table 11 walking and bicycling mode share	Verify figures for both Baseline and Plan as they do not appear to be consistent with the main book, Public Health Technical Report, and Performance Measures Technical Report.
12	Correction	p. 69; column 1; Strategic Plan; 1st paragraph; last sentence	Suggest revising this statement so that it is clear that the Plan is financially constrained.

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*Table 4. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative goes back and forth between Connect SoCal and RTP/SCS. It is okay to reference both in the opening statements of the section, but one should be used uniformly throughout the document to avoid confusion.



**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	Entire Section	The narrative interchangeably references John Wayne Airport as 1) John Wayne Airport, 2) JWA, and 3) Santa Ana throughout the document. While the FAA designation for the airport is SNA, all references to the airport as Santa Ana should be removed. Furthermore, JWA is not the FAA designation for the airport, so it too should be removed. When referencing the airport and for consistency throughout the document it should be referred to as John Wayne Airport.
3	General Comment	Entire Section	There should be acknowledgement of the FAA airport designations at the beginning of the section, so that stakeholders understand the FAA designation is not always consistent with the name of the airport. For example: John Wayne Airport is not JWA, but is SNA.
4	Correction	7	Ontario International Airport has a FAA designation of ONT not LAX
5	Correction	p. 8; left column; Ontario International Airport (LAX); 2 <sup>nd</sup> paragraph; last sentence	Missing period after "7 MAP" and missing sentences after "As for air cargo, Ontario"...
6	General Comment/Clarification	Entire Section	The base year identified for all aviation data is 2017, while the base year identified for much, if not all of Connect SoCal is 2016. Provide clarification as to why the base year is different for this section.
7	Correction	10	Aer Lingus, Aeroflot, Aeromexico, Aeromexico Connect, Air Canada, Air Canada (duplicate), Air Canada Rouge, and Air China do not have destinations listed. This appears to be a copy and paste error. The chart should be updated to be consistent with the remainder of the table.
8	Correction	10	Air Canada is duplicated in the table.
9	Correction	23	Change the date to 2045 in the title. Connect SoCal is 2020-2045 not 2020-2040.
10	Correction	23	Under the title "SCAG REGION AIR CARGO FORECASTS" correct the date to 2045. Connect SoCal covers 2020-2045 not 2020-2040.



**SUB-1**

Table 5. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Spell out all acronyms throughout the document (e.g. MAP-21, FAST act, MPO, SBCTA)
2	Clarification	P2, column 2, Figure 1	Explain why a mobility pyramid is used to display the strategies in improving and optimizing the transportation system. Is one component more important than the other, starting from top to bottom or bottom to top? Do they build on one another? Consider just using a bullet point list.
3	Correction	p. 6; column 1; Roles and responsibilities of partner agencies; 1 <sup>st</sup> paragraph	Replace "SGAG" with "SCAG"
4	Correction	P11, column 2, last paragraph	suggest revising the sentence to read, <b>EXHIBIT FIGURE 2</b> and <b>TABLE 2</b> depicts the vehicle hours of delay....
5	Clarification	P11, column 2, last paragraph	suggest revising the sentence to read,  However, yearly data <del>since then</del> shows that congestion has been increasing year over year since <del>then 2011</del> , and this includes <del>all the three</del> Caltrans districts <u>in the SCAG region. (Note- There was an increase in congestion from 2009-2010, a drop from 2010 to 2011, then an increase thereafter through 2017)</u>
6	Correction  Correction	P13, column 2, paragraph 1	<b>EXHIBIT FIGURE 3</b> depicts lost lane-miles...  <ul style="list-style-type: none"> <li>Revise the second sentence to show the following: "In 2016, the SCAG region lost an equivalent of <del>922</del> <b>998.79 or 999...</b>"</li> </ul> <p>Figure 3 shows a total of 998.79.</p>
7	General Comment	P14	Suggest adding <b>INTRO TEXT</b> to EXHIBIT 1 and TABLE 3 -Top 100 Bottlenecks..

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**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 22; left column; Regional and county congestion trends	Add references to Exhibit 1 and Table 3
9	Clarification	P23, column 1, paragraph 2	Add reference to FIGURE 4 at the end of the first sentence.
10	Clarification	P23	The non-recurrent congestion discussion and Figure 4 (recurrent/non-recurrent percent share) is inconsistent with the Highway non-recurrent delay discussion and Figure 11 on p37 of the <b>Performance Measures Technical Report</b> . Please reconcile.
11	Clarification	P24, column 2, Paragraph 2	In the second sentence identify a list of stakeholders that were contacted.
12	Correction	p. 23; column 1; Non-recurrent congestion; 2 <sup>nd</sup> paragraph; 5 <sup>th</sup> sentence	Reconsider this statement. Orange County is pretty much built-out but experiences much more non-recurrent congestion than recurrent congestion according to Figure 4.
13	Correction	P29, column 1, last paragraph	The TMCs are staffed 24/7 by CHP and Caltrans personnel, and monitor and respond to changes in traffic conditions, including <b>both</b> planned events and emergencies.
14	Correction	p. 31; column 2; SCAG's role; 3 <sup>rd</sup> paragraph; 1 <sup>st</sup> sentence	Suggested edit:  One county that is making particularly bold moves in the ITS realm is Los Angeles, which has recently debuted its "Connect-IT" project and accompanying website that is a warehouse of sorts for all ITS projects in the Los Angeles <u>County</u> region.
15	Define	P33 ff., TABLE 4	Timeframe, <b>Short</b> and <b>Long</b> -term need to be defined



**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	P39, Column 2, paragraph 2.	Revise bullet point one to say "...supportive policies for shared ride services, such as <del>Uber and Lyft</del> Transportation Network Companies (TNCs)"  Add a sentence suggesting that TNC's can contribute to SOV trips when TNC vehicles are driving around looking for customers.
17	Correction	p. 41; column 1; Ridesharing	Replace "ExpressLane" with "express lane"  "ExpressLane" is a Metro branding of the generic express lane.
18	Correction	41; column 2; Carpooling and vanpooling	Carpooling is <u>commonly defined as</u> when two or more people share a ride...
19	Clarification	P45	LAND USE. First paragraph. Why are there question marks on the years in, "Forecasts for the 2017? through 2025? planning years..."
20	Define	945	LAND USE. Define <b>small area levels</b> in "The baseline growth forecast provides the basis for developing the land use assumptions at the regional and <u>small area levels</u> which build 2020 Connect SoCal Plan Alternative."
21	Clarification / Correction	p. 47; column 2; New infrastructure	Clarify what the \$285.3 billion figure refers to and verify the amount. Is this supposed to be the total capital projects and other programs?  Replace "appendices" with "technical reports"

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*Table 6. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.



**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	General Comment	All maps with growth forecast and development types data	Add:  <u>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. The advisory sub-jurisdictional data shall not be required for purposes of qualifying for future grant funding or other incentives or for determining a proposed project’s consistency with the 2016 RTP/SCS for any impact analysis required pursuant to the California Environmental Quality Act (CEQA).”</u>
3	Correction	p. 2; column 1; last paragraph; last sentences	Replace “Economic Growth” with “Economic and Job Creation Analysis”
4	Correction	4; left column; Forecasting process overview; 2nd paragraph	Suggested edit:  <p style="text-align: center;">After developing the draft 2020 RTP/SCS between July 2019 and October 2019, SCAG released the draft 2020 RTP/SCS in <u>November</u> <del>October</del> 2019.</p>
5	Clarification	p. 7; Table 3	Verify values for 2000, 2010, and 2016 as they do not appear to be consistent with the Environmental Justice Technical Report.  Verify 2016 median age as it does not appear to be consistent with the Environmental Justice Technical Report.
6	Clarification	p. 18; Special focus: workplace automation and the gig economy	It may be appropriate to address the implications of AB 5 here.
7	Clarification	p. 28; Figure 11	Verify that this is labeled correctly

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**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 29; Table 13; Population	Verify values as they do not appear to be consistent with the Environmental Justice Technical Report.
9	Clarification	P. 42; Table 15	Priority growth areas defined differently in main book. Share of total growth for households and employment are not consistent with the main book. Constrained areas (absolute and variable) are not consistently defined and show different acreage.

*Table 7. ECONOMIC AND JOB CREATION ANALYSIS TECHNICAL REPORT COMMENTS*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 1; column 1; last paragraph	Suggested edit:  Over the <u>FY2020-21 through FY2024-45</u> <del>2021-2045</del> period, our region is expected to invest more than \$603...
2	Correction	p. 5; column 2; Local (neighborhood) congestion and economic competitiveness; 1 <sup>st</sup> paragraph; 2 <sup>nd</sup> sentence	Replace “Los Angeles region” with “SCAG region”
3	Correction	p. 9; Table 1	Missing fiscal year notation
4	Correction	p. 10; left column; Jobs resulting from investment spending on construction, operation and maintenance, plus multiplier effects; 1 <sup>st</sup> line	Replace “2021-2025” with “FY2020-21 through FY2024-25”
5	Correction	p. 10; Table 2	Missing fiscal year notation
6	Correction	p. 11; Table 3	Missing fiscal year notation

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**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 11; column 2; Total jobs resulting from the investment spending and enhanced network efficiency; 1 <sup>st</sup> paragraph	Replace "2021-2045" with "FY2020-21 through FY2044-45"
8	Correction	p. 12; Table 4	Missing fiscal year notation
9	Correction	p. 12; column 1; Conclusion	Replace "2021-2045" with "FY2020-21 through FY2044-45"

*Table 8. EMERGING TECHNOLOGY TECHNICAL REPORT COMMENTS*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	Entire Section	The narrative focuses in on electrification. Emerging Technologies may not necessarily be integrated into the current market, therefore, to the extent possible, discussions should be technology neutral.
2	General Comment	Entire Section	The section seems to repeat itself quite often. The section could be consolidated into a more streamlined section.
3	General Comment/Citation of Source	7	The narrative includes the following statement: "Additionally, robust user surveys show that within urban centers, carshare users will eventually sell a household vehicle, or forego a planned vehicle purchase, and instead adjust their daily trips using transit and active transportation." Citation should be included for the "user surveys" referenced, how many people in the survey, is this a Southern California survey? Additional details are needed.
4	General Comment	7	Under the Alternative Fuel Vehicles section. Following the use of the Emergency Public Safety Public Shutdown (PSPS) in the autumn of 2019, there is an increase focus on how electric vehicles will be charged if there is no electricity. Generators were needed throughout Northern California to provide power to charge vehicles. With the potential for PSPS events to increase, should there be less of a focus on electrification and more on technology neutral Alternative Fuel Vehicles?

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**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	Clarification	p. 8; column 2; Ridehailing/transportation network companies (TNCs)	It may be appropriate to address the implications of AB 5 here.
6	General Comment	8	How will Assembly Bill 5 impact Transportation Network Companies (TNCS) such as Uber and Lyft? Some note or consideration should be given to the significant impacts AB 5 will have on the gig worker sector.
7	General Comment	11	The Public Health/Safety paragraph focuses on electrification of the fleet only. Other technologies should be included in this section. Don't hydrogen fueled vehicles yield the same public health impacts as electric vehicles. Why isn't this section technology neutral if there are identical or very similar outcomes.
8	Reword Title	12	"Decline in Collisions and Deaths from Connected and Automated Features". Is there adequate data to support this statement? There have been a number of incidents (resulting in death) that have been attributed to the Tesla automated driving system. Additionally, we do not yet know the impact of connected vehicles or fully automated vehicles. While speeds may decrease, there is an increase in cyber threats and cyber terrorism. This is a very misleading title, if it is not removed, it should, at a minimum, be reworded to state "Potential Decline in Collisions and Deaths..."
9	General Comment/Correction	14	Vehicle Electrification. Almost all focus is on vehicle electrification. There should be equal space given to the other types of emerging alternative fuel technology. With the potential increased risk of PSPS (referenced in a previous comment), people may consider an alternative fuel technology different than electrification.
10	General Comment	15	Under "Existing Conditions: Alternative Fuel Vehicles" – again, this discussion is very focused on electric vehicles. There should be data regarding CNG, H2, and other technology. The constant focus on electric vehicles and electrification is leading.
11	General Comment	22	Focus on Vehicle Electrification is not technology neutral.



**SUB-1**

Table 9. ENVIRONMENTAL JUSTICE TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Page 3, Column 2, Paragraph 2, last sentence	Missing word – “As a part of [this or the] program, the agency also:
2	Clarification	p. 5; Table 1; Neighborhood change and displacement; Current conditions analysis	Consider rephrasing as this suggests that minority or EJ populations do not currently reside in suburban locations in the region.
3	Correction	5; Table 1; Rail-related impacts	Asterisks but no corresponding note.
4	Clarification	p. 19; column 1; How will impacts be analyzed?; 2nd paragraph; last sentence	Clarify if this is different than the Baseline definition used elsewhere in the Plan.
5	Clarification	p. 20; Table 5	Verify values for 2000, 2010, and 2016 total population and 2016 median age as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
6	Clarification	p. 21; column 1; Historical demographic trends; 2nd paragraph	Verify value for 2016 median age as it appears to be inconsistent with the Demographics and Growth Forecast Technical Report.  Define senior population.
7	Clarification	p. 21; column 2; Historical demographic trends; 2nd paragraph; last sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
8	Clarification	p. 23; Table 7; Total population	Verify values as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
9	Clarification	p. 24; column 1; Demographic trends in EJ areas in the SCAG region; 1st paragraph	Verify 68.6 percent figure with Demographics and Growth Forecast values, which indicate that White, non-Hispanic accounted for 41.7 percent of the regional population in 2016.

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**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	p. 26; column 1; Demographic trends in SB 535 Disadvantaged Communities in the SCAG region; last paragraph	Verify values for median age and percent of the seniors as they appear to be inconsistent with the Demographics and Growth Forecast Technical Report.
11	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 2nd paragraph; last sentence	Explain why the travel demand model assumes a decrease in poverty.
12	Clarification	p. 30; column 1; Expected future trends in EJ geographies; 3rd paragraph; 1st sentence	Explain why the travel demand model predicts a future that is inconsistent with the trend.
13	Clarification	Table 13	Add a column with the difference between High Wage and Low Wage Commute Distance
14	Clarification	Page 39, Column 2, Paragraph 1	<p>“SCAG used the regional median household income—the midpoint of an income distribution in the SCAG region—as Area Median Income (AMI) limit and assumed that a housing unit is affordable if a household whose income is at or below 80% of the AMI can live there without spending more than 30% of their income on rental units.”</p> <p>How was the regional median household income calculated? Why is AMI referenced if regional median was used? This really skews high wages and low wages between the region. For example, high wages in San Bernardino could be considered low wages in Orange County. While this may help social equity at the regional level, it is misleading at the County level.</p>



**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Clarification	Page 39, Column 2, Paragraph 1, Last Sentence	<p>“As is the case in job-to-worker ratio analysis, SCAG used a 2.5-mile buffer from the centroids of the census tracts and counted jobs and housing within the buffer distance to estimate the jobs-housing ratio and the low-wage jobs-housing fit at the neighborhood level.”</p> <p>This calculation at the census tract level seems like it would skew the results for census tracts that are primarily residential. For example, refer to Exhibit 12 to see that residential areas with little to no commercial nearby demonstrate that the ratio of low-wage jobs to affordable rental units is extremely high. In many areas, if more housing is built, it will result in a greater imbalance between jobs and housing.</p>
16	Clarification	Page 39, Column 2, Paragraph 3	EXHIBIT 9 - EXHIBIT 12
17	Clarification	p. 45; column 1; Results; 2nd paragraph; 1st sentence	Clarify end of sentence—“...future Technical Report.”
18	Correction	Page 46, Column 2, Paragraph 3	“They found that neighborhood <u>s</u> with higher public and private investment experienced more gentrification. “
19	Clarification	Page 49, Paragraphs 3-5	<p>Who is “he” referenced in the analysis?</p> <p>Replace “he” with name of researcher/s.</p>
20	Correction	Exhibit 13, p. 54	Remove I5 BRT line from map
21	Define	Exhibit 14, p. 55	<p>Define ‘communities of concern’ on the map.</p> <p>Some of these communities are brand new (e.g., Aliso Viejo, Rancho Santa Margarita) or were quickly developed over several decades and thus, have experienced significant change, but are far from being considered gentrified communities.</p>
22	Clarification	p. 73; column 2; Results; 2nd paragraph; 4th sentence	Why the San Gabriel National Monument? For example, the Santa Monica Mountains National Recreation Area is accessible by regular bus service.



**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
23	Clarification	p. 74; column 2; Accessibility to the San Gabriel National Monument	Why the San Gabriel National Monument? The Santa Monica Mountains National Recreation Area is accessible by regular bus service. Every state park in Orange County is accessible by transit plus a three-mile walking threshold.
24	Clarification	p. 92-93; Exhibits 21 and 22	An EJ area overlay would be useful.
25	Clarification	p. 95; column 1; Case study 1 – Advanced research on the built environment and collisions	Suggest enhancing the linkage to EJ.
26	Correction	Page 95, Column 2, Paragraph 3, Last Sentence	“Therefore, the collisions not only between automobile and bicycle but also between <del>automobile</del> <u>automobiles</u> do not stand out at the intersections with bicycle lane.”
27	Clarification	p. 99; Exhibit 24	An EJ area overlay would be useful.
28	Clarification	p. 101; Exhibit 25	An EJ area overlay would be useful.
29	Clarification	p. 103; Exhibit 26	An EJ area overlay would be useful.
30	Correction	p. 114; column 2; Trends and dynamics of aviation noise in the SCAG region and beyond; 1 <sup>st</sup> paragraph	Replace “SCAG Aviation Technical Chapter” with “Aviation and Airport Ground Access Technical Report”
31	Clarification	p. 116; column 1; Roadway noise impacts; 1 <sup>st</sup> paragraph	Verify value for centerline miles as it appears to be inconsistent with main book and Highways and Arterials Technical Report.
32	Clarification	p. 120; Exhibit 27	Why are low volume, lower speed State Highways be included here, such as SR-39 and SR-74?
33	Clarification	p. 126-129; Exhibits 28-31	An EJ area overlay would be useful. Can resolution be improved?
34	Clarification	p. 134-135; Exhibits 32-33	An EJ area overlay would be useful.



**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
35	Clarification	p. 162; column 1; Results; 1 <sup>st</sup> paragraph	Suggest delete "general toll lanes," to match Table 57.
36	Clarification	p. 164; Exhibit 34	An EJ area overlay would be useful.

*Table 10. GOODS MOVEMENT TECHNICAL REPORT COMMENTS*

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 13; column 2; Highway system; last paragraph; 1st sentence	What about I-710 and I-605?
2	Correction	p. 28; column 2; Figure 12	Capitalize "SCAG"

*Table 11. PERFORMANCE MEASURES TECHNICAL REPORT COMMENTS*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 14; column 2; Analytical approach; 2nd bullet	Suggest revising language to reflect definition of Baseline from Glossary of main book.
2	Performance Measures	Page 16, Column 1, Paragraph 3 (Land Consumption)	Why does this only analyze agricultural land and not vacant land?
3	Performance Measures	Page 18, Column 1, Paragraph 1 (Average Distance Traveled)	Is this even significant? 16.9 miles to 16.7 miles and 5.5 miles to 5.4 miles? Maybe indicate that this decrease is not significant?
4	Clarification	p. 51; Table 16	Suggest revising title to reflect pollutant emission reductions
5	Clarification	p. 57; Table 20	Verify Connect SoCal results for walk share (all trips) and bike share (all trips) as it appears to be inconsistent with the main book and Active Transportation Technical Report.

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**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 58; Table 20	<p>Replace "0.0%" with "N/A" for Trend for GHG emission reductions</p> <p>Missing footnote for asterisks for Baseline GHG emissions.</p> <p>Missing asterisks on Baseline criteria pollutant emissions to match footnote on page 59.</p>

*Table 12. HIGHWAYS AND ARTERIALS TECHNICAL REPORT COMMENTS*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 1; column 2; Executive summary	Verify centerline and lane miles as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
2	Clarification	p. 4; column 1; Regional significance	Verify mileage as it appears that values are inconsistent with Environmental Justice Technical Report and Transportation Conformity Technical Report.
3	Clarification	P5, column 1, paragraph 3	<p>Is this the most recent available data- 2012?</p> <p>In the SCAG region, nearly 44 percent of all pedestrian injuries are at intersections. (California Highway Patrol (<b>2012</b>). California Statewide Integrated Traffic Records System.)</p>
4	Clarification	ALL EXHIBITS	Reference to Route 206? between the 210 and 15 freeways north of Fontana
5	Clarification	GLOBAL	Lack of text reference to Exhibits, Figures/ Tables
6	Clarification	P7 and Global, column 1, paragraph 1	<p>Unsubstantiated citing of statistics e.g., What is the source of this information?</p> <p><i>On average, 1,500 people die, more than 5,200 are severely injured and 136,000 are injured on roadways throughout the SCAG region every year. These collisions are happening in communities all over the region, but 90% of collisions occur in urban areas and most collisions occur on local roads, not on highways. In fact, in the SCAG region, 65% of fatalities and serious injuries occur on less than 1.5% of the roadway network.</i></p>

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**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	P10, column 1, paragraph after the 4 bullets	SCAG will monitor these conditions to <b>ensure</b> they improve as expected and evaluate if the new funding is adequate to get the region's system in a state of good repair moving forward. <b>What happens if the conditions do not improve as expected or if the funding is inadequate? What's the timeframe for the expected improvements- this RTP cycle?</b>
8	Correction	P11	EXHIBIT 2 – Fix floating labels (roadways not showing on exhibit- only labels)
9	Correction	P12	EXHIBIT 3 Title - Plan <b>Year</b> 2045...(to be consistent with the text on p10 under Arterial Network).
10	Clarification	p. 20; Programmed commitments	It may be worth noting that Connect SoCal also includes expenditures for O&M as written on page 14.

TABLE 13. PASSENGER RAIL TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it's being used for the first time in the technical report
2	Clarification	2; column 2; Importance to the regional transportation system; 2nd paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
3	Clarification	4; column 2; Regional; 1st paragraph	Verify Metrolink's route miles as it appears to be inconsistent with latest (FY19-20) Metrolink adopted budget information.
4	Clarification	Pg. 5	Explain what LINKUS is, or refer to the section that has the explanation
5	Clarification	Pg. 5	Explain what type of capital improvements are being proposed/completed

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**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 5; column 1; Modeling approach and ridership forecasting; 1st paragraph; last sentence	Clarify this statement. It appears that the Metrolink SCORE program was assumed to be fully implemented and in operation beginning in 2035 in other parts of Connect SoCal.
7	Clarification	p. 6; column 1; Connectivity and gaps in service; 1st paragraph	It is worth noting that the Norwalk/Santa Fe Springs Metrolink Station is not served by Amtrak Pacific Surfliner.
8	Clarification	p. 8; column 2; The Southwest Chief	Provide applicable updates.
9	Correction	Pg. 9	Correct the formatting error under Metrolink section
10	Clarification	Pg. 11	The map should indicate different lines of Metrolink
11	Define	p. 14; column 1; Palmdale to Hollywood Burbank Airport	Define "SAA"
12	Clarification	14; column 2	Provide applicable updates on EIR/EIS documents.
13	Correction	Pg. 17	... all commuter and intercity trains enter and <del>exist</del> <u>exit</u> LAUS through a constricted five-track "throat" located north of station.
14	Clarification	Pg. 18, Table 1	Clarify why Tres Estrellas de Oro and TUFESA do not have associated cities
15	Clarification	Pg. 19	Clarify why Tres Estrellas de Oro and TUFESA are not shown on the map
16	Clarification	Pg. 23, Figure 5	Use/show percentages to demonstrate data. It's not clear what the numbers mean.
17	Clarification	Pg. 24 and 26	Provide more clear status updates for projects
18	Correction	Pg. 30	The effort took a comprehensive look at a variety of the agency's organizational elements including a strengths, weakness, opportunities, and <del>challenges</del> <u>threats</u> analysis (SWOT analysis),...
19	Correction	Pg. 31	<ul style="list-style-type: none"> <li>A candidate project list is incorporated <del>in to</del> <u>into</u> the <del>MOU</del> <u>MOU</u> for the \$1 billion in early investments to be funded by 2020.</li> </ul>



**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	Pg. 34	Explain what the difference is between Constrained Plan and Strategic Plan

*Table 14. PUBLIC HEALTH TECHNICAL REPORT COMMENTS*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 2; column 2; Executive summary; 1st paragraph	Suggest revising comparison of criteria pollutant emissions to Base Year per footnotes in Performance Measures Technical Report and main book.
2	Clarification	p. 2; right column; Executive summary; 1st paragraph	Suggest reference to Baseline definition in Glossary of main book
3	Clarification	p. 2; column 2; Executive summary; 2nd paragraph	Verify time savings by mode, mode share changes between Baseline and Plan as it appears the values are not consistent with the Performance Measures Technical Report, Active Transportation Technical Report, and main book.
4	Clarification	p. 45; Table 5	Verify Baseline and Plan values for share of growth in HQTAs as it appears to be inconsistent with main book.  Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
5	Clarification	p. 46; Table 5	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.
6	Clarification	p. 49; Table 8	Verify Plan value for percentage of PM peak transit trips less than 45 minutes as it appears to be inconsistent with main book.
7	Clarification	p. 52; column 2; Table 10	Verify Baseline and Plan values for criteria pollutants as it appears to be consistent with main book. What unit are the criteria pollutant emissions shown?
8	Clarification	p. 56; column 1; Table 12	Verify Baseline and Plan values for share of jobs in HQTAs as it appears to be inconsistent with main book.

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**SUB-1**

Table 15. PUBLIC PARTICIPATION TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	Tables 2 & 4	Add number of attendees for each event

Table 16. SCS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2020 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.
2	General Comment	All	Review use of "cities". Word "jurisdictions" should often be used to include counties and incorporated cities, not just incorporated cities.
3	Correction	p. 16-18, Figures 2,3,4	Delete Figures 2,3, & 4.  These figures include draft scenarios used at the public workshops that do not properly reflect development agreements and entitled projects. This was shared with SCAG staff and its consultants at the public workshops. The response was that the maps would be corrected; they were never corrected. Although these were draft scenarios used to collect public input, since they do not properly reflect entitlements, they should be removed from the SCS document so as to not further mislead any reader that these were viable options.
4	Clarification	p. 16 column 2, paragraph 2	"In this future, more funding is available to invest in expanded bus and rail networks..."  Clarify where the funding comes from for these programs.
5	Clarification	p. 16 column 2, paragraph 2	"More drivers would be able to make the switch to electric vehicles, because additional funding is secured for EV charging infrastructure and local consumer rebates make electric vehicles more accessible."  Clarify where the funding comes from for these programs. Explain how blackouts will be dealt with.

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**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 22 column 2, paragraph 2	<p>“Conversely, growth focused in urban areas often takes advantage of existing infrastructure and more efficient service to higher concentrations of jobs and housing.”</p> <p>Add: <u>But, infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</u></p>
7	Clarification	p. 29 column 1, paragraph 2	<p>“...with priority placed on infill settings, existing/planned service areas and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence-<del>z</del>” <u>where feasible.</u>”</p>

Table 17. TRANSIT TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	p. 24-29; Exhibit 1-6	Suggest changing coloring for Urban Rail. Coloring used for 2045 network works better.
2	Correction	p. 76; column 1; Planned HQTCS; 2 <sup>nd</sup> paragraph	Replace “V4” with “Exhibit 14”
3	Correction	p.84; last line	Replace “V4” with “Exhibit 14”

Table 18. TRANSPORTATION CONFORMITY TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 21; column 2; Connect SoCal No Build	Correct years of FTIP.
2	Clarification	P42	<p>Right column, paragraph under Criteria and Procedures...of TCMs</p> <p>...the shortfall must be made up by either substituting a new TCM strategy or by enhancing other control measures through the substitution. (sounds incomplete)</p>

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**SUB-1**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	P44	Last line on the left column— <b>“see Section III.2 of this document.”</b> Not clear which document this is referencing. (No Section III in the Technical Report or Main document)

*Table 19. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS*

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	Correction	p. 10; Table 3.1; Local option sales tax measures	Los Angeles County effectively levies a permanent 2.0 percent sales tax with passage of Measure M.
2	Correction	p. 10; Table 3.1; Highway tolls	Suggest deleting “(in core revenue forecast” since a toll revenue source is not included in the reasonable available sources.
3	Correction	p.29	HIGHWAY TOLLS, first paragraph, revise as follows:  TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor <del>Agency Agencies</del> (SJHTCA), which oversees the San Joaquin Hills (State Route 73) toll road, and the Foothill/Eastern Transportation Corridor <del>Agency Agencies</del> (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) toll roads.

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*TABLE 20. TRANSPORTATION SAFETY & SECURITY TECHNICAL REPORT COMMENTS*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All	Spell out all Acronyms when it’s being used for the first time in the technical report
2	General Comment	All	Size of bullets are too big
3	Clarification	Pg. 1	Traffic collisions also relate to congestion and, thus, involve greenhouse gas emission due to bottlenecking and emergency management fees. ← does not make sense? Why would it involve fees? Is it meant to say cost?



**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Correction	Pg. 7	Existing Conditions <u>for</u> Safety: This section...
5	Define	Pg. 21	Define "Traffic Calming Measures".
6	Clarification	p. 29, column 1, paragraph 2	<p>"Fatalities and serious injuries related to aggressive driving and speeding have increased as seen on the table, <del>and below are some strategies</del> SCAG recommends local jurisdictions <del>to</del> implement strategies that could reduce fatalities and serious injuries <del>related to</del> <u>related to</u> aggressive driving and speeding, <u>which could include, but are not limited to:-</u></p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> conducting public outreach...</li> <li>• <del>Local jurisdictions should</del> identifying locations with...</li> <li>• <del>Local jurisdictions should</del> promoting best engineering...</li> <li>• <del>Local jurisdictions should</del> setting speed limits that are safe..."</li> </ul> <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>
7	Clarification	p. 29, column 2, paragraph 1	<p>"SCAG recommends the following strategies for local jurisdictions to improve safety for aging populations, <u>which could include, but are not limited to:-</u>"</p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> supporting roadway, intersection...</li> <li>• <del>Local jurisdictions should</del> promoting implementation of ...</li> <li>• <del>Local jurisdictions should</del> implementing design treatments...</li> <li>• <del>Local jurisdictions should</del> working with Transit network...</li> <li>• <del>Local jurisdictions should</del> establishing Safe Routes for ..."</li> </ul> <p>As written, these items sound like mitigation measures and mandates. We recommend reformatting as suggested.</p>





**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Clarification	p. 30, column 2,	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety for bicyclists, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> supporting connecting bicycle...</li> <li>• <del>Local jurisdictions should</del> developing and implement...</li> <li>• <del>Local jurisdictions should</del> adopting Complete Streets...</li> <li>• <del>Local jurisdictions should</del> implementing pedestrian and...</li> <li>• <del>Local jurisdictions should</del> using intersection control...</li> <li>• <del>Local jurisdictions should</del> conducting bicycle education...</li> <li>• <del>Local jurisdictions should</del> supporting expanding Safe...</li> <li>• <del>Local jurisdictions should</del> utilizing SCAG’s ...</li> <li>• <del>Local jurisdictions should</del> implementing traffic calming...</li> <li>• <del>Local jurisdictions where applicable should</del> developing a...</li> <li>• <del>Local jurisdictions should</del> participating in programs to...”</li> </ul>
9	Clarification	p. 31, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve commercial vehicle safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> supporting the use of dedicated...</li> <li>• <del>Local jurisdictions should</del> identifying intersections and...</li> <li>• <del>Local jurisdictions should</del> identifying and promote the...</li> <li>• <del>Local jurisdictions should</del> identifying rest stops along...”</li> </ul>
10	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to reduce fatalities and injuries related to distracted driving, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> developing enforcement and...</li> <li>• <del>Local jurisdictions should</del> improving data quality on...</li> <li>• <del>Local jurisdictions should</del> conducting education on the...”</li> </ul>
11	Clarification	p. 31, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve emergency response services, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> using Intelligent...</li> <li>• <del>Local jurisdictions should</del> developing guidance...”</li> </ul>



**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> improving data collection... and</li> <li>• <del>Local jurisdictions should</del> identifying high injury...</li> <li>• <del>Local jurisdictions should</del> working with the State and...</li> <li>• <del>Local jurisdictions should</del> working with transit network...”</li> </ul>
13	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve research and data collection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> improving data collection...</li> <li>• <del>Local jurisdictions should</del> identifying high injury...</li> <li>• <del>Local jurisdictions should</del> working with the State and...</li> <li>• <del>Local jurisdictions should</del> working with transit network...”</li> </ul>
14	Clarification	p. 34, column 1	<p>“SCAG recommends the following strategies for local... jurisdictions to reduce impaired driving fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> promoting and expand safe...</li> <li>• <del>Local jurisdictions should</del> extending and promote late...</li> <li>• <del>Local jurisdictions should</del> developing a methodology to...</li> <li>• <del>Local jurisdictions should</del> developing and distribute a...</li> <li>• <del>Local jurisdictions should</del> designing and develop a study...</li> <li>• <del>Local jurisdictions should</del> improving enforcement with...</li> <li>• <del>Local jurisdictions should</del> increasing frequency...”</li> </ul>
15	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve safety at intersections, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• Incorporate intersection safety into the planning grant strategy.</li> <li>• <del>Local jurisdictions should</del> incorporating Intelligent...</li> <li>• <del>Local jurisdictions should</del> implementing infrastructure...</li> <li>• <del>Local jurisdictions should</del> implementing installation of...</li> <li>• <del>Local jurisdictions should</del> planning for, and develop...</li> <li>• <del>Local jurisdictions should</del> reducing modal conflicts at...”</li> </ul>



**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
16	Clarification	p. 35, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to reduce the occurrence of lane departure fatalities and injuries, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> continuing the deployment... of</li> <li>• <del>Local jurisdictions should</del> addressing systemic risks on...</li> <li>• <del>Local jurisdictions should</del> improving the dissemination...</li> <li>• <del>Local jurisdictions should</del> targeting highest risk...</li> <li>• <del>Local jurisdictions should</del> implementing an effective...</li> <li>• <del>Local jurisdictions should</del> promoting the use of vehicle...”</li> </ul>
17	Clarification	p. 36, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve motorist safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> working with the state and...</li> <li>• <del>Local jurisdictions should</del> working with local...</li> <li>• <del>Local jurisdictions should</del> promoting the most...”</li> </ul>
18	Clarification	p. 37, column 1	<p>“SCAG recommends the following strategies for local jurisdictions to improve occupant protection, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> increasing enforcement and...</li> <li>• <del>Local jurisdictions should</del> implementing education ...</li> <li>• <del>Local jurisdictions should</del> promoting the establishment...</li> <li>• <del>Local jurisdictions should</del> improving occupant...”</li> </ul>
19	Clarification	p. 37, column 2	<p>“SCAG recommends the following strategies for local jurisdictions to improve pedestrian safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• Continuing to work with local jurisdictions to provide a...</li> <li>• <del>Local jurisdictions should</del> developing pedestrian safety...</li> <li>• <del>Local jurisdictions should</del> ensuring all sidewalks and...</li> <li>• <del>Local jurisdictions should</del> supporting improvements to...</li> <li>• <del>Local jurisdictions should</del> considering pedestrian needs in...</li> <li>• <del>Local jurisdictions should</del> facilitating the planning...</li> <li>• <del>Local jurisdictions should</del> increasing pedestrian crossing...</li> <li>• <del>Local jurisdictions should</del> incorporating pedestrian...</li> <li>• <del>Local jurisdictions should</del> participating in programs...</li> <li>• <del>Local jurisdictions should</del> improving pedestrian striping...</li> <li>• <del>Local jurisdictions should</del> incorporating median...</li> <li>• <del>Local jurisdictions should</del> considering installation of...</li> <li>• <del>Local jurisdictions should</del> developing citywide Safe...</li> <li>• <del>Local jurisdictions should</del> continuing to improve...”</li> </ul>



**SUB-1**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	p. 38, column 1	<p>SCAG recommends the following strategies for local jurisdictions to improve work zone safety, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> improving safe driving...</li> <li>• <del>Local jurisdictions should</del> applying advanced technology ...</li> <li>• <del>Local jurisdictions should</del> improving work zone data..."</li> </ul>
21	Clarification	p. 38, column 2	<p>SCAG recommends the following strategies for local jurisdictions to improve safety for young drivers, <u>which could include, but are not limited to:</u></p> <ul style="list-style-type: none"> <li>• <del>Local jurisdictions should</del> establishing a task force to...</li> <li>• <del>Local jurisdictions should</del> implementing the Driver...</li> <li>• <del>Local jurisdictions should</del> supporting state authorities...</li> <li>• <del>Local jurisdictions should</del> implementing and maintain...</li> <li>• <del>Local jurisdictions should</del> establishing efforts to address..."</li> </ul>
22	Correction	Pg. 39	4 <sup>th</sup> bullet: sentence is not finished
23	Correction	Pg. 39	5 <sup>th</sup> bullet: First part of the sentence is missing
24	Correction	Pg. 40	<p>Urban areas are usually multi-modal and have more conflict points. As speed increases, driver focuses less on surroundings, <u>and the driver's</u> <del>Driver's</del> field of vision &amp; ability to see pedestrians, bicyclists or cars entering the roadway is diminished.</p>



**Metro**

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Metropolitan Transportation Authority

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Los Angeles, CA 90012-2952

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**TRANS-1**

January 21, 2020

Draft Connect SoCal Plan Comments  
Attn: Connect SoCal Team  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017

Dear Connect SoCal Team:

The Los Angeles Metropolitan Transportation Authority (Metro) appreciates the opportunity to review and comment on the draft Connect SoCal plan.

The Connect SoCal plan aligns closely with many Metro plans and policies, including Metro's Vision 2028 Plan and 2020 Long Range Transportation Plan (LRTP). Collectively, our plans share many of the stated goals of Connect SoCal to improve mobility, accessibility, safety and resiliency of our transportation system while reducing greenhouse gas emissions (GHG) and supporting healthy equitable communities.

1

As the largest provider of public transportation in the Southern California Association of Governments (SCAG) region, Metro recognizes the critical role we play as a partner in achieving the ambitious GHG and vehicle miles travelled (VMT) reduction targets identified in the Connect SoCal plan. Metro is fully committed to supporting SCAG in reaching these targets through the investment and deployment of mobility solutions.

Cities, through their public engagement processes, land use authority and management of their street network, similarly will be critical to achieving the targets set in the Connect SoCal plan. To this end, Metro recommends that SCAG consider a more robust plan to support cities with SB 743 implementation. As you are aware July 1, 2020 is the statewide implementation date for public agencies to adopt VMT as a metric for identifying and mitigating transportation impacts within CEQA. To date, very few cities in Los Angeles County have adopted the required changes. SCAG should consider providing technical assistance to cities directly, or at the subregional level, regarding the assessment of VMT, the development of thresholds of significance and mitigation measures. A regional approach to SB 743 implementation would not only provide consistency but may also support the further development of a quantifiable set of mitigation measures over time that reliably reduce VMT.

2

Thank you again for the opportunity to comment. I look forward to our continued collaboration in advancing sustainable mobility strategies throughout the region.

3

Sincerely,

Kalieh Honish  
Executive Officer, Long Range Planning  
Metro Countywide Planning & Development



**2020 RTP/SCS PEIR  
OCTA Technical Comments**

#	Chapter	Page and location	Comment
1	<i>Executive Summary</i>	ES-4; second bullet	Replace "\$633.9 billion" with "\$638.6 billion"
2	<i>Executive Summary</i>	ES-6, <i>Table ES-2</i>	Reformat to help clarify to readers that several rows are subsets of a row above (e.g., "Arterials" are a subset of "Capital Projects and Other Programs").
3	<i>Executive Summary and 2.0 Project Description</i>	ES-10 and 2.0-31; <i>Congestion pricing</i>	Consider adding local road charge program to this section.
4	<i>Executive Summary and 3.4 Biological Resources</i>	<i>Table ES-5</i> (2.0-26 and 3.4-71)	Suggested edit:  PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:
5	<i>Executive Summary and 3.4 Biological Resources</i>	<i>Table ES-5</i> (2.0-27 and 3.4-78)	Suggested edit:  PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:

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**2020 RTP/SCS PEIR  
OCTA Technical Comments**

#	Chapter	Page and location	Comment
6	<i>Executive Summary and 3.4 Biological Resources</i>	<i>Table ES-5 (2.0-29 and 3.4-84)</i>	<p>Suggested edit:</p> <p>PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u>. Such measures may include the following or other comparable measures identified by the Lead Agency.</p>
7	<i>Executive Summary and 3.4 Biological Resources</i>	<i>Table ES-5 (2.0-30 and 3.4-89)</i>	<p>Suggested edit:</p> <p>PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u>. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>
8	<i>Executive Summary and 3.4 Biological Resources</i>	<i>Table ES-5 (2.0-32 and 3.4-94)</i>	<p>Suggested edit:</p> <p>PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u>. Such measures may include the following or other comparable measures identified by the Lead Agency.</p>

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#	Chapter	Page and location	Comment
9	<i>Executive Summary and 3.4 Biological Resources</i>	<i>Table ES-5 (2.0-33 and 3.4-98)</i>	<p>Suggested edit:</p> <p>PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u>. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>
10	<i>Executive Summary and 3.5 Cultural Resources</i>	<i>Table ES-5 (2.0-34 and 3.5-35)</i>	<p>Suggested edit:</p> <p>PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u>. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>
11	<i>Executive Summary and 3.5 Cultural Resources</i>	<i>Table ES-5 (2.0-36 and 3.5-41)</i>	<p>Suggested edit:</p> <p>PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u>. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>

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**2020 RTP/SCS PEIR  
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#	Chapter	Page and location	Comment
12	<i>Executive Summary and 3.7 Geology and Soils</i>	<i>Table ES-5 (2.0-37 and 3.7-35)</i>	Suggested edit:  PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:
13	<i>Executive Summary and 3.7 Geology and Soils</i>	<i>Table ES-5 (2.0-39 and 3.7-41)</i>	Suggested edit:  PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:
14	<i>Executive Summary and 3.9 Hazards and Hazardous Materials</i>	<i>Table ES-5 (2.0-39 and 3.8-68)</i>	Suggested edit:  PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:
15	<i>Executive Summary and 3.10 Hydrology and Water Quality</i>	<i>Table ES-5 (2.0-52 and 3.10-67)</i>	Project Level Mitigation Measure PMM-HYD-4 states “ensure all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation”. Clarify if this only applies to bridges. The cost to raise rail tracks and highways one foot could be very expensive.

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#	Chapter	Page and location	Comment
16	<i>Executive Summary and 3.13 Noise</i>	<i>Table ES-5 (2.0-57 and 3.13-45)</i>	Suggested edit:  PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:
17	<i>Executive Summary and 3.17 Transportation, Traffic, and Safety</i>	<i>Table ES-5 (2.0-64 and 3.17-63)</i>	Suggested edit:  PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:
18	<i>Executive Summary and 3.18 Tribal Cultural Resources</i>	<i>Table ES-5 (2.0-66 and 3.18-20)</i>	Suggested edit:  PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:
19	<i>2.0 Project Description</i>	<i>2.0-17; Table 2.0-3</i>	Reformat to help clarify to readers that several rows are subsets of a row above (e.g., "Arterials" are a subset of "Capital Projects and Other Programs"). Add asterisks to applicable items ("Other", "Regionally Significant Local Streets and Roads").

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#	Chapter	Page and location	Comment
20	2.0 Project Description	Figures following 2.0-42	Update figures to reflect comments submitted on RTP/SCS and Technical Reports, including but not limited to Figure 2.0-5, Figure 2.0-8, Figure 2.0-11, and Figure 2.0-18.



January 24, 2020

Mr. Kome Ajise  
 Southern California Association of Governments  
 900 Wilshire Blvd., Ste. 1700  
 Los Angeles, CA 90017

**Subject: Comments by San Bernardino County Transportation Authority and San Bernardino Council of Governments on the draft 2020 Regional Transportation Plan/Sustainable Communities Strategy (*Connect SoCal*) and draft Program Environmental Impact Report**

Dear Mr. Ajise:

The San Bernardino County Transportation Authority (SBCTA) and San Bernardino Council of Governments (SBCOG) appreciate the opportunity to provide comments on the Southern California Association of Governments' (SCAG's) draft 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and draft Program Environmental Impact Report (PEIR). Both documents have been very professionally prepared, with substantial input over the last several years from County Transportation Commissions (CTCs), councils of governments (COGs), local jurisdictions, other transportation agencies, advocacy groups, and the public. We appreciate the working relationship we have had with SCAG to bring the 2020 RTP/SCS to this point in its development. We look forward to the Regional Council's approval of the RTP/SCS in April and receiving subsequent federal approval for air quality conformity.

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Our comments can be classified into three general themes:

- A summary of SBCTA's sustainability activities over the last several years
- Overall perspectives on the 2020 RTP/SCS
- Specific comments on the content of the draft RTP/SCS and PEIR (Attachment 2) and a list of edits to the San Bernardino County portion of the RTP/SCS Project List (Attachment 3)

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### **SBCTA AND SBCOG SUSTAINABILITY INITIATIVES**

As you are aware, SCAG and SBCTA jointly executed a Sustainability MOU in 2014 titled "Collaboration between SBCTA and SCAG to Implement the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy." Although the MOU itself has become dated at this point, it is important to recognize that SBCTA and our local partners (transit agencies and local jurisdictions) are proactively pursuing sustainability initiatives throughout San Bernardino County. These activities represent important contributions to sustainability

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Kome Ajise  
January 24, 2020  
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region-wide, and we thought it would be appropriate to highlight some of these in our comment letter on the RTP/SCS.

The San Bernardino Countywide Vision is a centerpiece of our sustainability activities. The Vision was adopted by the County of San Bernardino and SBCTA members in June 2011, well prior to the execution of the Sustainability MOU with SCAG. The Vision is very consistent with the direction of the RTP/SCS and gave San Bernardino County an important foundation for the activities that have been undertaken since that time. Extensive information is available on the Countywide Vision site at <http://cms.sbcounty.gov/cao-vision/Home.aspx>.

In brief, the following are recent and ongoing sustainability initiatives of SBCTA and SBCOG:

- Transit investments – Over \$600 million is being invested in high-capacity transit infrastructure over a 10-year period, an extraordinary investment for a county generally thought to be suburban, with just over 2 million residents.
- Joint report with SCAG: “*Customer-Focused, Technology-Enabled Multi-Modalism Action Plan*,” completed in 2018 and containing 16 targeted initiatives for transit, transportation demand management (TDM), and active transportation in San Bernardino County.
- Active transportation – we have delivered or are in the process of delivering over \$50 million in State Active Transportation Program grants, together with our local partners.
- Expansion of the SBCTA rideshare/vanpool program (in progress)
- Zero-Emission Vehicle Readiness and Implementation Plan (completed 2019)
- Countywide GHG Reduction Plan and EIR (completed in 2014 and in the process of being updated to address SB 32 goals for GHG reduction)
- Regional Energy Partnership
- Partnerships on Clean Freight
- Climate Adaptation Plan and Partnership with Western Riverside COG (Plan will be complete in February)
- Healthy Communities Best Practices Toolkit
- Preparation of a Regional Conservation Investment Strategy (RCIS), pursuant to AB 2087 – Draft has been prepared, and is being refined using a Wildlife Conservation Board grant.
- SB 743 Countywide VMT Implementation Study (being completed in Spring 2020 for all the jurisdictions in the county)
- Two Comprehensive Multimodal Corridor Plans are underway, in partnership with the Riverside County Transportation Commission, Caltrans District 8, and SCAG.

Attachment 1 to this letter expands on these activities. The SBCTA Sustainability web page can be accessed at: <https://www.gosbcta.com/planning-sustainability/>.

## OVERALL PERSPECTIVES ON THE 2020 RTP/SCS

Prior to the more detailed comments contained in the attachments, SBCTA has some overall perspectives for how the RTP/SCS can be used to achieve the mobility, safety, and sustainability goals of the region in the coming years. These comments relate to our own Countywide Transportation Plan; perspectives on transit, VMT, GHGs, and a multimodal transportation system; our emerging express lane network; goods movement; and airports.

### SBCTA's Countywide Transportation Plan and Relationship to the 2020 RTP/SCS

SBCTA's 2015 Countywide Transportation Plan (CTP) is being updated to be consistent with the RTP/SCS. The 2015 CTP outlined a path forward for a sustainable transportation future, laying out an achievable strategy for highway and transit facilities, transit oriented development (TOD), air quality, GHG reduction, freight, airports, transportation demand management (TDM), active transportation, and funding. The CTP analyzes two future scenarios: a "baseline scenario" that assumes traditional revenue sources (generally consistent with what the RTP/SCS defines as "core revenues") and an "aggressive scenario" (generally consistent with RTP/SCS "Plan" revenues, including the innovative sources identified in the Plan). The projects and programs in the aggressive scenario of SBCTA's updated CTP are consistent with the lists in SCAG's RTP/SCS. SBCTA has provided SCAG with technical corrections to the San Bernardino County portion of the RTP/SCS project list in a separate communication so that the changes can be incorporated into the modeling for the final RTP/SCS.

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### Need for a Balanced, Multimodal Transportation System

As noted above, SBCTA is investing heavily in the transit system, TDM, and active transportation. At the same time, our citizens and businesses remain extremely concerned about living up to the commitments in our Measure I half-cent sales tax. Much of the concern centers around the congestion on freeways, interchanges, and the regional arterial system. We have prioritized interchange improvements and are proceeding to deliver those improvements, having completed eight major interchange projects in the last 10 years. We are well into delivery of 10 additional interchanges and are working with local jurisdictions on strategic ramp improvements. Interstates 10 and 15 are being addressed largely through our managed lane strategy, as described in the next section.

We appreciate SCAG's acknowledgement that "*given that critical gaps and congestion choke points still exist in the system, improvements beyond those that are operational in nature still need to be considered*" (page 73 of RTP/SCS). In other words, the RTP/SCS acknowledges that highway improvements are still necessary, even though most of the attention is being given to trip-reduction strategies, with the goal of reducing GHGs and VMT.

At the same time, it is important to acknowledge that each individual project should not be expected to reduce VMT. What is important is the impact of the overall strategy. In San Bernardino County, the RTP/SCS shows that VMT per capita is being reduced by 2% through 2045 just with the "baseline" investment and by 5% with the "Plan" investment

(see page 122). While this is well below the 15% per capita reduction goal identified by the Governor's Office of Planning and Research (OPR), it represents billions of dollars of investment in transit and trip reduction measures over that time period and appears realistic for San Bernardino County to achieve. There are two primary points: 1) each project cannot be held to a VMT reduction target, and state/regional agencies should not impose that requirement; and 2) VMT thresholds should be set at levels that are achievable within the bounds of financial capacity and the modal choices that travelers make within the context of their geographic setting.

The RTP/SCS demonstrates how difficult it is to reduce VMT even with many billions of dollars invested in alternative modes of travel. Regionally, the Plan reduces per capita VMT by 9.5% between 2016 and 2045, but the population increases by about 20%. In other words, total VMT can still be expected to increase regionally by about 10%. The VMT increase in the Inland Empire will be more in the range of 25%. The rate of population growth tends to outstrip the per capita reductions that can be achieved, so expectations of VMT reduction need to be tempered with what is realistic.

The good news is that GHGs can be reduced even if the absolute VMT increases, following the same path as the region's remarkable improvement in air quality as population and travel has dramatically increased. This means that, for mobile sources, the path to GHG reduction will largely fall on clean energy production, energy efficiency, technological innovations, and more rapid turnover of vehicle fleets. The GHG analysis in the 2040 California Transportation Plan demonstrated that vehicle and fuels technology will be the primary way in which GHG reduction goals will need to be met. VMT reduction is an appropriate goal, but technology will be the principal path to long term GHG reduction. SBCTA looks forward to partnering with SCAG, the State, and the utility industry to pursue these opportunities, consistent with the initiatives we have mentioned earlier, while also doing what we can in transit and TDM to reduce VMT. We are excited to be involved in the Governor's "Regions Rise Together" initiative, which recognizes that there are no "one-size-fits-all" solutions as far as transportation management and GHG reduction are concerned.

### **Regional Express Lane Network**

As indicated in the RTP/SCS, SBCTA has two major express lane implementation initiatives: I-10 from the Los Angeles County line to Ford Street in Redlands, and I-15 from the Riverside County line, up the Cajon Pass, through Victor Valley, to just north of the Mojave River. These projects are not only multi-modal projects for passengers, with benefits for buses, vanpools, and 3+ carpools, but they will significantly improve freight mobility as well. Each project includes auxiliary lanes and will take some of the auto travel out of the general purpose lanes.

It is noteworthy that the I-10/I-15 interchange, at the heart of Inland Empire logistics activity, is designated as the 15<sup>th</sup> most critical freight bottleneck in the United States (per the American Transportation Research Institute), and the I-10 and I-15 corridors represent the major gateways from/to Southern California to/from the rest of America. The express lanes will also permit light duty (under 10,000 pounds) commercial traffic. Improvement of these corridors is a win-win for



both multimodal passengers and freight, but will need to be staged over the duration of the RTP/SCS.

One request from SBCTA is that one of the sample projects listed in the HOV section of Table 3.2 on page 77 of the RTP/SCS be swapped out with another from the project list. Please replace the I-210 project (Add one HOV lane in each direction from I-215 to I-10) with an additional express lane project (I-10 Contract 2A – add two Express Lanes in each direction from I-15 to Sierra Avenue). The I-10 project has more visibility, is more short term, and more appropriate for inclusion on the sample list. It has an expected completion year of 2029 and cost of \$700 million. This is consistent with FTIP amendment 19-13. No changes to the master project list are required.

### **Goods Movement**

SBCTA appreciates SCAG's analysis of freight bottlenecks, documented in the Goods Movement appendix of the draft RTP/SCS. As you know, San Bernardino County is both benefitted by the logistics industry and at the same time heavily impacted by freight. Three of our freight bottlenecks appear on Exhibit 7: I-10 east of I-15, I-15 south of I-10, and I-15 through the Cajon Pass. This is consistent with the notation earlier about the critical bottleneck on the ATRI "top 100" list at the I-10/I-15 interchange. However, we would request that the 15,000-20,000 AVHD bottlenecks be added to Table 7 on pages 53 and 54, given that these are more "fixable" than many of the bottlenecks to our west, which may have higher delay values but are much more constrained and costly to improve.

The San Bernardino County bottlenecks have near-term solutions in the works, and are likely to be strong candidates for freight program funding at the State and federal level. There are only a few of these "second-tier" bottlenecks in the region and could easily be added to Table 7. We would also point out that our freight bottleneck on eastbound I-10 in Yucaipa is one that did not make the delay threshold, but can be addressed at a relatively low cost (\$37 million for a truck climbing lane). We would recommend that the next RTP/SCS include the "feasibility of improvement" as a factor in the bottleneck evaluation, particularly given the competitive nature of freight program funding grants, such as those for SB 1.

As an additional note, we believe that the regional freight collaboration that has worked so well for our regional project funding through the State's Trade Corridor Improvement Fund (TCIF) program should be re-invigorated. The collaboration is in a good position to craft a program of freight projects that can be most competitive for State and federal freight program funds.

### **Airports**

It should be noted that control over Ontario International Airport (ONT) was transferred from the Los Angeles World Airports to the Ontario International Airport Authority (OIAA) in November 2016. SBCTA and our partner agencies appreciate the regional support that has been provided by SCAG and other agencies around the region, enabling ONT to serve 5.5 million

passengers in 2019, the highest level in a decade. We look forward to continuing local and regional efforts to make ONT a truly regional asset.

The RTP/SCS shows the projected airport passenger forecasts for 2017 through 2045 in Table 3.3. The Plan shows that LAX and ONT account for 80% of the passenger growth region-wide. LAX is forecast to increase by 42 million annual passengers (MAP) to 127 MAP, or 50% higher than existing. ONT is forecast to increase by 28 MAP to 33 MAP, or about six times the existing passenger volume. The market will ultimately determine how rapidly each airport will grow. However, it would be helpful if SCAG could consider some additional analysis as a way of quantifying airport accessibility. It is suggested that graphics be produced for each of the seven major airports that show travel time contours and the population within each contour. In other words, this would answer the question of how much population is within 15 minutes of each airport, 30 minutes of each airport, 60 minutes of each airport, etc for both peak and off-peak conditions. It would be done for both existing and 2045 to see how airport accessibility might change with changing traffic conditions. Perhaps for the next RTP/SCS an airport accessibility index could be developed. This could be an additional data point for the forecasting of future passenger volumes.

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Secondly, it would be beneficial to have SCAG compile regular monitoring data for all the airports in Southern California, perhaps on an annual basis, using the FAA Air Traffic Activity Data System (ATADS) or other appropriate data sources. This would be useful to just keep tabs on airport growth and operational characteristics region-wide. Finally, it would be useful for SCAG to maintain information on project activity at the airports, focusing on projects geared toward capacity expansion and airport efficiency improvements.

### **Programmatic Environmental Impact Report (PEIR)**

Regarding the PEIR, we appreciate the structure of the document and the mitigation measures. The mitigation measures encourage action, but do not put requirements on the County Transportation Commissions or local jurisdictions, beyond those already required by State or federal law. It also acknowledges that project-level environmental studies will need to be conducted prior to the implementation of any specific project, which is why a lesser level of detail was provided in the PEIR.

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We have no significant comments on the PEIR. In Attachment 2 to this letter we indicate that it is difficult to match up VMT data between the RTP/SCS and PEIR. It may have to do with vehicle classes included or excluded, but we would request that differences in VMT, GHGs, or other performance measures between the two documents be clearly explained.

SCAG also indicates that the PEIR for the RTP/SCS may be useful as a basis for streamlining CEQA clearance for certain types of projects. SBCTA looks forward to collaborating with SCAG to take advantage of this opportunity, where possible.

Kome Ajise  
January 24, 2020  
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Please see the attachments for additional comments. As stated earlier, SBCTA appreciates all the efforts by the SCAG Regional Council and SCAG staff to make the 2020 RTP/SCS a reflection of where the region is headed over the next 25 years. We look forward to continuing partnerships with SCAG to implement the projects and programs in the RTP/SCS.

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Regards,



Raymond Wolfe  
Executive Director

## **Attachment 1 SBCTA and SBCOG Sample Sustainability Initiatives**

SBCTA and SBCOG have worked closely with SCAG in implementing and delivering sustainability projects in the region and have affirmed our commitment every four years when SCAG embarks on developing the RTP/SCS. In 2014, SBCTA/SBCOG and SCAG jointly executed a MOU on Sustainability planning efforts and delineated a list of activities demonstrating SBCTA/SBCOG's commitment to implementing the sustainability elements of the RTP/SCS. Although some project level specifics and programs in the MOU have changed over the years, the main goals and principles have remained and are still applicable and consistent with the latest 2020 RTP/SCS.

When it comes to San Bernardino County, the San Bernardino Countywide Vision is a centerpiece of our sustainability activities. Although the Vision was adopted by the County of San Bernardino and SBCTA/SBCOG in June, 2011, it still serves as the foundation for the all sustainability efforts in the County. Although the draft Connect SoCal (2020 RTP/SCS) provides an overview of some of these activities region wide, it is useful to provide a more specific status report on San Bernardino County's sustainability work. ([https://www.gosbcta.com/wp-content/uploads/2019/09/SBCTA-Sustainability\\_FINAL\\_digital.pdf](https://www.gosbcta.com/wp-content/uploads/2019/09/SBCTA-Sustainability_FINAL_digital.pdf)). Based on Table ES-3 Connect SoCal Goals, here are some examples of sustainability projects from SBCTA/SBCOG that align with the RTP/SCS.

**Connect SoCal Goal #2 “Improve mobility, accessibility, reliability, and travel safety for people and goods.”**

**Active Transportation Investments Countywide** – Agencies are now engaged in delivering bicycle and pedestrian improvements made possible by over \$50 million in State Active Transportation Program (ATP) grants. SBCTA has recently updated its Active Transportation Plan to include a Safe Routes to School element, a Points of Interest element, and a Complete Streets element. A countywide sidewalk inventory project is underway.

**Connect SoCal Goal #3 “Enhance the preservation, security, and resilience of the regional transportation system”**

**Climate Adaptation Partnership with Western Riverside COG** – This plan has been initiated to address the potential effects of climate change in Riverside and San Bernardino counties and identify ways to work together to address the challenges. As a result, the Inland Empire has formed a Climate Collaborative consistent with SB 1072 to put policies identified in the Regional Climate Adaptation Plan.

**Connect SoCal Goal #4 “Increase person and goods movement and travel choices within the transportation system.”**

**The Redlands Passenger Rail Project** – This is a 9-mile rail line between Redlands and downtown San Bernardino, to be operational in late 2021, using self-propelled trainsets. As part of this project, SBCTA will implement a zero emission passenger rail trainset, a first in North America.

**Connect SoCal Goal #5 “Reduce greenhouse gas emissions and improve air quality.”**

**Countywide GHG Reduction Plan and EIR** – This effort was completed in 2014 and is now being updated to address the State’s 2030 GHG reduction goals under SB 32. The Plan includes the State’s first and only certified PEIR for countywide GHGs and has facilitated adoption of local Climate Action Plans (CAPs).

**Connect SoCal Goal #6 “Support healthy and equitable communities.”**

**Healthy Communities Best Practices Toolkit** – The San Bernardino County Department of Public Health created a Strategic Plan for the implementation of Healthy Communities policies. The toolkit, a collaboration between SBCOG and the County, will contain sample policies, resolutions, processes, organizational structure, and lessons learned from agencies that have implemented health-related policies.

**Connect SoCal Goal #8 “Leverage new transportation technologies and data-driven solutions that result in more efficient travel.”**

**Partnerships on Clean Freight** – Using a federal DOE grant and state CEC grant, SBCTA partnered with Ryder to place over 200 natural gas fueled trucks into its leasing fleet in Southern California as well as a maintenance facility and two fueling facilities. We are currently working with the BYD, BNSF railroad, and Daylight Transportation to pilot battery electric drayage trucks at Intermodal Yards in San Bernardino and Los Angeles and a distribution facility in Fontana.

**Connect SoCal Goal #10 “Promote conservation of natural and agricultural lands and restoration of critical habitats”**

**Habitat Conservation** – San Bernardino County and SBCOG are collaborating on an effort to create a Regional Conservation Investment Strategy (RCIS) through the process established by the California Department of Fish and Wildlife under AB 2087.

Aside from the specific activities referenced in the MOU, it should be noted that SBCTA completed its Countywide Transportation Plan (CTP) in 2015 and is being updated to be consistent with the 2020 RTP/SCS. The CTP is built on a foundation of economic and environmental sustainability. It recognizes that mobility and smart land development are needed to sustain the economic growth and competitiveness necessary for survival within the global economy. This economic growth is needed, in turn, to fund the array of statewide and regional sustainability commitments. San Bernardino County must invest in all modes of transportation, including highways, to support its businesses and growing population.

Please visit SBCTA’s Sustainability page on our website at <https://www.gosbcta.com/planning-sustainability/?category=sustainability>, including our Sustainability Fact Sheet.

## Attachment 2

### Additional Comments on the Text of the RTP/SCS (Connect SoCal) Main RTP/SCS Report

- Page 18 - Figure 2.2 needs more explanation within the graphic itself. The Y-axis is not labeled. Are these thousands of jobs regionally? May be better presented as percentages of jobs subject to automation.
- Page 23, second paragraph under Transportation System – The paragraph references Exhibit 2.3, Existing Arterial System. The text refers to express lanes, while the graphic refers to Expressway/Parkway. Needs to be clarified. Also, what criteria were used for inclusion as an arterial? Was this the FHWA designation?
- Page 27, Exhibit 2.4 – Suggest that I-215 from SR-91 to I-15 be included in the map. Also, there are two intermodal facility dots shown in San Bernardino. Not clear what the second one is.
- Page 30 – Interesting graphic on mode of access to airports. Define “on-call.” Is that where TNCs are included? Please clarify.
- Page 31 – Grey text is hard to read in the electronic version. Needs more contrast.
- Page 37 – Graphic should say annually, for number of injuries and fatalities.
- Page 59, Under Progress Since 2016 – Refers to “Three roadway improvement/rehabilitation projects, including bridge improvement have already been programmed.” There have to be many more projects than that around the region. Referencing only three projects is very underwhelming. It would seem that a number of the “Progress Since 2016” sections could be improved.
- Page 61 – You may want to caveat the mileage-based user fee discussion, to be clear that no specific plans have been made to implement such a system at this time, and that implementation would need to occur on a statewide basis.
- Page 66 – Please re-orient the list of transit projects for San Bernardino from shorter term to longer term and please omit the Foothill/San Bernardino BRT from the list. That project is too long term. So the list would be in this order: Redlands Passenger Rail, West Valley Connector Phase 1, Gold Line Extension to Montclair, and Passenger Rail Service from San Bernardino Metrolink Line to Ontario Airport.
- Page 77 – I-15 Express Lane segment 5 – take out reference to High Desert Corridor and say “to north of Mojave River.” For long range projects like this, it would be adequate to round the costs off to the nearest million.
- Page 102, Figure 4.7 – If it is possible to add dash patterns to similar-color lines, that would be helpful in distinguishing the operators from one another.
- Page 103, Table 4.3 – Title should state that the revenue forecast covers both capital and operating/maintenance costs. The numbers would be very large for only capital costs, so clarifying that O&M costs are included would reduce the number of questions.
- Page 122 and throughout Table 5.1 – It is important to clearly distinguish when statistics include light duty vehicles only, versus all vehicles. For example, the GHG per capita targets for SB 375 purposes relate to light duty vehicles only. On page 122, the basis of the VMT data is unclear. It is clarified as light duty in Table 5.1, but should also be stated on page 122 and on Figure 5.1 as well. Same with daily minutes of delay. Is that person delay or vehicle delay, and which vehicle sectors are included? The definition of VMT is also critical to distinguish for SB 743 purposes, to avoid confusion. We did not

see where total VMT statistics are presented. Truck delay by facility type is presented, but we did not see truck VMT within the main body of the RTP/SCS or in the Goods Movement appendix. Also, we could not match the VMT data in the RTP/SCS with the VMT data in the PEIR. Perhaps the differences are because of the inclusion or exclusion of vehicle types. Please review these sections to make sure the references are always clearly explained.

9

### **Goods movement appendix**

- Page 50 – Please add more truck volume data points in the Inland Empire. Volumes in the I.E. are not well represented, given the role of the IE in goods movement.
- Page 51 – See comments within the text of the letter on the bottleneck relief strategy. The likelihood and cost of fixing the bottlenecks should be factored into the bottleneck relief strategy, not just the sheer magnitude of delay. Some bottlenecks have massive delays, but there are practical and cost limitations to relieving that congestion.
- Page 61 – SBCTA supports the language in the first bullet regarding working with the federal government on a low NOx engine standard for heavy-duty trucks. We signed onto the ultra low-NOx petition several years ago, along with SCAQMD and CARB. The standards should be developed at the national level, given the amount of travel through San Bernardino County by out-of-state trucks. Having a California-only standard could disadvantage our businesses further and will not be as effective. California and our region should strive for a level playing field as part of our air quality strategy.
- Page 94 – The South Archibald grade separation is planned, not complete.

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## Attachment 3

**Comments on the Draft 2020 RTP/SCS Project List (note: costs are in \$1000s; current RTP entry was copied directly from Table 2 of Project List Appendix)**

1. LOCAL HIGHWAY SAN BERNARDINO, COUNTY OF 200837 0 VISTA ROAD 0 0 VISTA ROAD GRADE SEPARATION-WIDEN 2-4 LANES AND CONSTRUCT GRADE SEPARATION (PA&ED ONLY) 2030 \$50,000 – **Comment: Change cost to \$4,000 (\$ in 1000s), since PA&ED only**
2. LOCAL HIGHWAY SAN BERNARDINO COUNTY 4120193 0 VARIOUS LOCATIONS VARIOUS TRAFFIC SIGNAL PROJECTS THROUGHOUT SAN BERNARDINO COUNTY 2023 \$519,912 – **Comment: should have a completion year of 2040; costs should be \$5,000.**
3. LOCAL HIGHWAY COLTON 4160046 0 MT VERNON I-10 EB RAMPS COOLEY DR WIDEN MT VERNON ACROSS UPRR AND SANTA ANA RIVER FROM 2 TO 4 LANES 2025 \$30,000 – **Comment: delete, because it is in FTIP as:**
  - a. SAN BERNARDINO STATE HIGHWAY 20190010 4120198 10 COLTON: MT. VERNON AVE BRIDGE WIDENING OVER I-10: WIDEN MT. VERNON BRIDGE STRUCTURE (3-4 LANES; 1 NEW SB LANE) TO ACCOMMODATE NEW DEDICATED TURN AND BIKE LANES, WIDEN MT. VERNON AVE (2-4 LANES) FROM I-10 EB OFF/ON-RAMPS TO APPROX. 300 FT SOUTH ALONG MT. VERNON; REALIGN MT. VERNON & E VALLEY BLVD INTERSECTION; RELOCATE WB ON-RAMP (REMAINS 1 LANE AT THE MAINLINE). \$53,869
4. STATE HIGHWAY SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY (SBCTA) 4120198 10 I-10 I-10 MT VERNON AVE I-10 @ MT VERNON AVE INTERCHANGE IMPROVEMENTS 2035 \$38,500 – **Comment: Delete, because it is in FTIP as:**
  - a. SAN BERNARDINO STATE HIGHWAY 20190010 4120198 10 COLTON: MT. VERNON AVE BRIDGE WIDENING OVER I-10: WIDEN MT. VERNON BRIDGE STRUCTURE (3-4 LANES; 1 NEW SB LANE) TO ACCOMMODATE NEW DEDICATED TURN AND BIKE LANES, WIDEN MT. VERNON AVE (2-4 LANES) FROM I-10 EB OFF/ON-RAMPS TO APPROX. 300 FT SOUTH ALONG MT. VERNON; REALIGN MT. VERNON & E VALLEY BLVD INTERSECTION; RELOCATE WB ON-RAMP (REMAINS 1 LANE AT THE MAINLINE). \$53,869
5. STATE HIGHWAY SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY (SBCTA) 4160004 10 I-10 I-10 GROVE AVE/4TH ST I-10 @ GROVE AVE/4TH ST NEW INTERCHANGE 2045 \$199,000– **Comment: Delete because it is in FTIP as:**
  - a. SAN BERNARDINO STATE HIGHWAY 2002160 2002160 10 I-10 AT GROVE AVE AND 4TH ST: CONSTRUCT NEW INTERCHANGE AT I-10 AND GROVE AVE; CLOSE EXISTING I-10/FOURTH ST INTERCHANGE; AND LOCAL STREET IMPROVEMENTS ALONG GROVE AVE (CHILD PROJECT IS 20171102). \$199,423
6. STATE HIGHWAY CALTRANS 4200S001 395 US-395 1.8 MI S/O DESERT FLOWER RD FARMINGTON RD WIDEN US-395 FROM 1.8 MI S/O DESERT FLOWER RD TO FAMINGTON RD 2025 \$459,978 – **Comment: change date to 2035**



7. STATE HIGHWAY SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY (SBCTA) 4M01043 215 I-215 I-215 MT VERNON/ WASHINGTON AVE I-215 @ MT. VERNON/WASHINGTON ST INTERCHANGE RECONSTRUCTION 2045 \$109,048 –  
**Comment: Delete, as it is duplicate of:**
  - a. LOCAL HIGHWAY CALTRANS 4160072 215 WASHINGTON I-215 WASHINGTON I-215 & WASHINGTON/MT. VERNON; REPLACEMENT BRIDGE PROJECT TO PROVIDE STANDARD VERTICAL AND HORIZONTAL CLEARANCES FOR THE ULTIMATE I-215 ROADWAY. 2023 \$29,252
8. STATE HIGHWAY SAN BERNARDINO ASSOCIATED GOVERNMENTS (SANBAG) 4M07007 210 SR-210 SR-210 BASELINE AVE SR-210 @ BASELINE AVE INTERCHANGE IMPROVEMENTS 2020 \$15,600– **Comment: Delete because it is in FTIP as:**
  - a. SAN BERNARDINO STATE HIGHWAY 201186 REG0701 210 AT SR-210/BASELINE IC: RECONSTRUCT/WIDEN BASE LINE BETWEEN CHURCH AVE AND BOULDER AVE FROM 4 TO 6 THROUGH LANES AND EXTEND LEFT TURN LANES, WIDEN RAMPS – WB EXIT 1 TO 3 LANES, WB AND EB ENTRANCES 1 TO 3 LANES INCLUDING HOV PREFERENTIAL LANES (EA 1C970) \$31,216
9. STATE HIGHWAY HESPERIA 4M07014 15 I-15 I-15 MOJAVE ST I-15 @ MOJAVE ST NEW INTERCHANGE 2040 \$45,000 – **Comment: Delete as it is no longer in the SBCTA Nexus Study, so can be deleted from RTP project list.**
10. RTP ID 4120219 Foothill/San Bernardino from San Manuel Casino to Kaiser Hospital (Sierra Ave. Fontana) – Full BRT 2045 – Comment: Can be deleted, as this route is mostly covered by RTP ID 4120205. – **Comment: Please change to 5<sup>th</sup> St/Baseline from San Manuel Casino to San Bernardino Transit Center – Express Bus 2045 - \$15,000.**




**Transportation Corridor Agencies™**

January 23, 2020

Via Email: [2020PEIR@scag.ca.gov](mailto:2020PEIR@scag.ca.gov)

Mr. Kome Ajise  
Executive Director  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017

**RE: Comments on the Draft Connect SoCal Plan 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy and associated Draft Programmatic Environmental Impact Report**

Dear Mr. Ajise:

The San Joaquin Hills Transportation Agency and the Foothill/Eastern Transportation Corridor Agency (“TCA”) appreciates the opportunity to review and provide comments on the Draft Connect SoCal Plan 2020-2045 Regional Transportation Plan (“RTP”)/Sustainable Communities Strategy (“SCS”) and associated Draft Programmatic Environmental Impact Report (“PEIR”). TCA commends the Southern California Association of Governments (SCAG) staff and consultants 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.

TCA supports the comments submitted by the Orange County Council of Governments (OCCOG) on behalf of Orange County jurisdictions, the Center for Demographic Research, the Orange County Transportation Authority, and other Orange County jurisdictions.

In addition, TCA submits the following comments to clarify the RTP/SCS Project List Technical Report and offer recommended clarification to the documents text.

## DRAFT CONNECT SOCIAL PLAN

### Transportation Network and Funding the Transportation System

The TCA are two joint-powers agencies formed in 1986 to plan, finance, construct and operate State Routes 73, 133, 241 and 261 (The Toll Roads), which constitute 20 percent of Orange County’s major thoroughfares (see attached Toll Road System Map). The Toll Roads were originally planned as freeways; however, due to a lack of state funding they had to be built as tolled roads. To finance the roads, toll revenue bonds were sold as the major funding source [private funds] and development impact fees have been assessed on new construction under Section 66484.3 of the California Government Code. Consistent with

the goals of AB 32 and SB 375, the Toll Road network helps to reduce GHG emissions that would otherwise be emitted by idling passenger cars and trucks on freeways and major arterials, by providing free-flow congestion relief. While these roads are a significant part of the major highway system in Orange County and the region and are, indeed, included in the core revenues from local sources (Highway Tolls), Figure 4.10, *Core Revenues, Local Sources, in Nominal Dollars* (page 105), Table 4.5 *Summary of Revenues* (page 108), Table 4.6.1 *FY2045 RTP/SCS Revenues, in Nominal Dollars, Billions* (page 112), they are not included in the discussion regarding transportation system (page 23), transportation demand management (page 64), transportation system management (page 64), highway and arterial network (page 73), regional express lane network (page 74) or paying our way forward (page 97). 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. Focus in the Draft Connect SoCal Plan as well as the Draft PEIR is only on toll lanes and express/high occupancy toll lanes. Accurately describing the extent of private funding for highways 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.

2

***Recommended Clarification***

TCA requests that the language in the Draft Connect SoCal Plan and associated PEIR be expanded to appropriately describe the existing and planned inter-operable priced transportation network in the region, including Express Lanes, HOT lanes, and Toll Roads, specifically acknowledging the following points:

3

- 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/HOT 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 GHG emissions caused by congestion.
- The publicly owned TCA-operated Toll Road network in Orange County 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 ensures that these facilities can relieve congestion and associated air pollution and GHG emissions on parallel freeways and major arterials without further stressing limited state, federal and local transportation funding resources. In addition, user fees provide an economic incentive for cost-sharing that promotes ridesharing, which is beneficial to reduced criteria pollutants and GHG emissions reductions.
- The discussion should include that express lanes, HOT lanes and toll roads generate user fees that pay for construction and operation of their facilities.

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**Page 73, Highways and Arterials Network**

The Connect SoCal Plan should include toll roads 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. TCA-operated 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***

- Revise the text in the last sentence on page 73 to read, “Projects include interchange improvements, auxiliary lanes, general purpose lanes, carpool lanes, toll roads, toll lanes, and Express/HOT lanes. The complete list of projects can be found in the Project List Technical..”
- Add the SR 241/91 Express Lanes (HOT) Connector project (FTIP ID ORA111207/RTP ID 2T01135) to Exhibit 3.2 *Major Highway Projects*, Table 3.2 *Sample Highway Projects*, and Exhibit 3.3 *Planned Regional Express Lane Network*.
- The text under this section should discuss that all priced facilities in the SCAG region ensure inter-operability 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.

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**PROJECT LIST TECHNICAL REPORT**

**Page 66, Table 1: FTIP Projects, Project 10254**

County	System	FTIP ID	RTP ID	Route #	Description	Project Cost (\$1,000's)
ORANGE	STATE HIGHWAY	10254	10254	73	SAN JOAQUIN HILLS TRANSPORTATION CORRIDOR (SJHTC – SR 73). 15 MI TOLL RD BETWEEN 1-5 IN SAN JUAN CAPISTRANO & RTE 73 IN IRVINE, CONSISTENT WITH SCAG/TCA MOU 4/5/01. EXISTING 3 M/F EA DIR. 1 ADDITIONAL M/F EA DIR, PLUS CLIMBING & AUX LANES BY <del>2020</del> <b>2022</b> .	\$351,188

***Recommended Clarification***

- In Table 1, we request that the completion date for Project 10254 be clarified as 2022, consistent with the discussions between TCA, OCTA and SCAG.

**Page 298, Table 3: Strategic Projects, RTP ID S2160011**

County	System	RTP ID	Route #	Route Name	From	TO	Description	Lead Agency
ORANGE	STATE HIGHWAY	S2160011	73	SR-73/GL ENWOOD			INTERCHANGE IMPROVEMENT (PHASE 2 & 3)	TCA

**Recommended Clarification**

TCA’s Project 10254 description (Route 73/ San Joaquin Hills Transportation Corridor) is correctly listed in Table 1 *FTIP Projects*; however, Table 3 *Strategic Projects* also lists specific components of this project (the SR 73/ Glenwood Interchange Improvement (Phase 2 & 3)) as a separate TCA project with a unique RTP ID number (S2160011). This reference and project should be removed as it is part of the parent Project 10254.

**Page 67, Table 1: FTIP Projects, Project ORA050, ORA051 and ORA011207**

County	System	FTIP ID	RTP ID	Route #	Description	Project Cost (\$1,000’s)
ORANGE	STATE HIGHWAY	ORA050	ORA050	241	EASTERN TRANSPORTATION CORRIDOR (ETC-SR 241/261/133) 26.4 MI TOLL ROAD CONNECTS SR 91 TO I-5 VIA SR 261 AND SR 133, CONSISTENT WITH \$631,902 SCAG/TCA MOU 4/05/01. EXISTING 2 M/F EA DIR. 2 ADDITIONAL M/F IN EA DIR, PLUS CLIMBING AND AUX LANES BY <del>2020</del> <u>2022</u> .	\$631,902
ORANGE	STATE HIGHWAY	ORA051	ORA051	241	FOOTHILL TRANSPORTATION CORRIDOR-NORTH (FTC-N - SR 241). 12.7 MI TOLL ROAD BETWEEN OSO PKWY AND ETC, CONSISTENT WITH SCAG/TCA MOU \$269,045 4/05/01. EXISTING 2 M/F IN EA DIR. 2 ADDITIONAL M/F, PLS CLIMBING & A UX LANES BY <del>2020</del> <u>2022</u> .	\$269,045
ORANGE	STATE HIGHWAY	ORA111207	2T01135	241	241/91 EXPRESS LANES (HOT) CONNECTOR: NB SR-241 TO EB SR-91, WB SR-91 TO SB SR-241, PER SCAG/TCA MOU 4/05/01. PAED PHASE.	\$33,728

**Recommended Clarification**

- In Table 1, we request that the completion date for Projects ORA050, ORA051, and ORA111207 be clarified as 2022, consistent with the discussions between TCA, OCTA and SCAG.

**Page 297, Table 3: Strategic Projects, RTP ID SORA052**

County	System	RTP ID	Route #	Route Name	From	TO	Description	Lead Agency
ORANGE	<del>LOCAL</del> STATE HIGHWAY	SOR A052	241	SR 241	Oso Pkwy	I-5	FOOTHILL TRANSPORTATION CORRIDOR-SOUTH — OSO PKWY TO I-5 (SANDIEGO).	TCA

**Recommended Clarification**

- In Table 3, we request that Project ORA052 be classified as a “State Highway” system consistent with the classification of the TCA Toll Road network.

Overall, TCA’s project descriptions in Table 1 *FTIP Projects*, for projects ORA050, ORA051, ORA111207, 10254 and Table 3 *Strategic Projects*, for project ORA052 are correctly listed, as of the current FTIP. However, for ORA050, ORA051 and 10254 TCA recently submitted to OCTA a revision to these projects showing that TCA has met its original TCM commitments for the TCA Corridors. The revised projects highlighting the TCA strategic projects have been submitted to SCAG for review.

**TRANSPORTATION FINANCE TECHNICAL REPORT**

**Page 2, Financial Plan, Introduction**

The draft document states that “Our region has successfully implemented toll systems in the past with the Transportation Corridor Agencies’ network of privately financed toll roads and express lanes along interstate 10, interstate 110 and State Route 91, including the most recent extension into Riverside County.” 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) utilize private funds. They provide congestion relief and associated air pollution and GHG emissions reduction without further stressing limited federal, state, and local transportation funding.

**Page 29, Highway Tolls**

**Recommended Clarification**

Under Highway Tolls Description we request the following revisions:  
 “TCA consists of two separate government entities—the San Joaquin Hills Transportation Corridor ~~Agency Agencies~~ (SJHTCA), which oversees the San Joaquin Hills (State Route 73) Toll Road, and the Foothill/Eastern Transportation Corridor ~~Agency Agencies~~ (F/ETCA), which oversees the Foothill (State Route 241) and Eastern (State Route 241, State Route 261, and State Route 133) Toll Roads.”

## TRANSPORTATION CONFORMITY TECHNICAL REPORT

### Page 8, Highway Networks

The discussion on the coding of the region's freeway system specifically mentions express lanes, toll lanes and HOT lanes, but not toll facilities such as existing Toll Roads SR 73, SR 241, SR 133 and SR 261 in Orange County.

#### *Recommended Clarification*

- Revise text under this section to include toll roads, "Include detailed coding of the region's freeway system (mixed-flow lane, auxiliary lane, HOV lane, HOT lane, toll lane, and truck lane, toll roads, etc.) as well as Express ways arterials, major and minor collectors.

### Page 20, Toll Roads

The discussion on Toll Roads states that, "There were approximately 325 lane miles of toll roads in 2016, increasing to about 1,855 toll/HOT lanes in 2045. This includes a regional Express Lane network (TABLE 8) that would build upon the success of the 91 Express Lanes and Transportation Corridor Agencies (TCA) Toll Roads in Orange County and two demonstration projects in Los Angeles County." However, none of the TCA operated Toll Roads are included in Table 8.

#### *Recommended Clarification*

- Table 8 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.
- TCA's facilities should be added to Table 8 as tolled facilities and the effect of the toll charges on these facilities should be incorporated into the highway assignment procedure.

TCA thanks you in anticipation of your written responses to these comments. We look forward to the amendments in the final 2020-2045 RTP/SCS and associated Draft 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, Chief Environmental Planning Officer, at 949.754.3475 or via email at [vmcfall@thetollroads.com](mailto:vmcfall@thetollroads.com).

Sincerely,



Michael A. Kraman  
Chief Executive Officer

Attachments

Cc: Sarah Jepsen, SCAG  
Ping Chang, SCAG  
Valarie McFall, TCA  
TCA Board of Directors

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**ATTACHMENT: THE TCA TOLL ROAD SYSTEM NETWORK**







COUNTY OF LOS ANGELES  
DEPARTMENT OF PARKS AND RECREATION

LOC-1

*"Parks Make Life Better!"*

John Wicker, Director

Norma E. Garcia, Chief Deputy Director

January 16, 2020

Mr. Roland Ok  
SCAG Main Office  
900 Wilshire Boulevard, 16th Floor  
Los Angeles, CA 90017

Dear Mr. Ok:

**DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT  
2020-2045 REGIONAL TRANSPORTATION PLAN/  
SUSTAINABLE COMMUNITIES STRATEGY (CONNECT SOCIAL PLAN)**

Thank you for the opportunity to review and comment on the Draft Program Environmental Impact Report (PEIR) for the Connect SoCal Plan. The Los Angeles County Department of Parks and Recreation (DPR) has reviewed the PEIR and offers the following comments and suggested edits:

1

General Comments:

**Los Angeles Countywide Parks and Recreation Needs Assessment (2016)**

The PEIR should include a discussion of the Los Angeles Countywide Parks and Recreation Needs Assessment, and incorporate relevant data and recommendations from the final report. Adopted by the Board of Supervisors on July 5, 2016, the Countywide Parks Needs Assessment was a historic and significant undertaking to engage all communities within Los Angeles County in a collaborative process to gather data and input for future decision-making on parks and recreation. The primary goal of the Parks Needs Assessment was to quantify the magnitude of need for parks and recreational facilities, and determine the potential costs of meeting that need. This goal has been accomplished, as evidenced by the final report which uses a transparent, best-practices approach to evaluate park and recreation needs, and is the product of an engagement process that involved the public, cities, unincorporated communities, community-based organizations, and other stakeholders. Please access the Parks Needs Assessment at this link: <http://lacountyparkneeds.org/>

2

**Transit to Parks Strategic Plan (2019)**

The PEIR should include a discussion of Metro's Transit to Parks Strategic Plan and incorporate relevant data and recommendations from the Plan. The Strategic Plan presents a systematic vision for increasing access to parks and open space countywide.

3

Mr. Roland Ok  
 January 16, 2020  
 Page 2

The goal is to find targeted, holistic ways to increase access to parks and open spaces, especially for communities of need. These communities, especially those that are not within walking distance or without convenient public transit to a park, are the focus of the Plan. Expanding access is a key priority for the region, as demonstrated in the Los Angeles Countywide Parks Needs Assessment, which highlights the lack of park and open space access in communities across the county, particularly for lower income, disadvantaged residents. Please access the Transit to Parks Strategic Plan at this link: <https://www.metro.net/projects/transit-parks/>

3

3.16 Parks and Recreation, page 3.16-9

Please revise the last sentence as follows: "~~The Los Angeles County General Plan has established a standard of 4 acres of local parkland per 1,000 residents in the unincorporated areas and 6 acres of regional parkland per 1,000 residents of the total population in Los Angeles County. According to the General Plan (2015), the County has a substantial deficit in local parkland, providing approximately 0.6 acres of local parkland per 1,000 unincorporated residents but 7.02 acres of regional parkland per 1,000 residents (total), which is above the regional standard. According to the Los Angeles County Parks Needs Assessment (2016), there are 3.3 acres of local parkland per 1,000 residents, which is less than the 4.0 acres per 1,000 goal in the Los Angeles County General Plan. There are 86.2 acres of regional open space and natural areas per 1,000 people, which highly exceeds the goal of 6 acres of regional parkland per 1,000 in the Los Angeles County General Plan.~~"

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3.16 Parks and Recreation, page 3.16-10

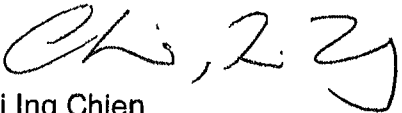
Please correct the number as follows: "Los Angeles County has ~~177~~ 181 County parks and 24 state parks..."

5

Thank you for your consideration of our comments. If you have any questions, please contact me at (626) 588-5317 or by email at [jchien@parks.lacounty.gov](mailto:jchien@parks.lacounty.gov).

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Sincerely,



Jui Ing Chien  
 Park Planner

JIC:ev

c: Parks and Recreation (C. Lau)



# Memorandum

County of Ventura • Resource Management Agency • Planning Division  
800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • [ventura.org/rma/planning](http://ventura.org/rma/planning)

**DATE:** January 22, 2020  
**TO:** Southern California Association of Governments  
**FROM:** Abigail Convery, Ventura County Planning Division  
**SUBJECT:** Draft Program Environment Impact Report (PEIR) for Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). RMA 19-001-1.

I have reviewed the Southern California Association of Governments (SCAG) Draft Program Environmental Impact Report (PEIR) for Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RMA 19-001-1), which covers areas in unincorporated Ventura County.

1

## **Biological Resource Analysis**

### **1. Ventura County Locally Important Species and Communities**

The biological resource assessment associated with the Draft EIR did not include language which would address impacts on the County’s Locally Important Species or communities, nor were they considered “special status species.” The potential to occur and potential impacts to Ventura County Locally Important Species must be evaluated and mapped. For a complete listing of Locally Important Species, please see the following link: <https://vcrma.org/ceqa-implementation-and-initial-study-assessment-guidelines> .

2

Impacts to Locally Important Communities (e.g., oak woodlands and California black walnut woodland) should be evaluated in the EIR. The Ventura County General Plan defines a Locally Important Community as “a plant or animal community that is considered by qualified biologists to be a quality example characteristic of or unique to the County or region.” The EIR should evaluate direct and indirect (i.e., dust, diminished water supply, etc.) impacts to Locally Important Communities.

### **2. Ventura County Initial Study Assessment Guidelines**

Project level mitigation measures identified in the draft EIR did not clarify whether projects occurring in the County would be evaluated in accordance with Ventura County’s adopted CEQA environmental thresholds of significance. Projects that occur within the unincorporated County should be assessed using the County’s CEQA thresholds of significance which are set forth in the Ventura County Initial Study

3

Assessment Guidelines (April 26, 2011), available online at:  
[http://www.ventura.org/rma/planning/pdf/ceqa/current\\_ISAG.pdf](http://www.ventura.org/rma/planning/pdf/ceqa/current_ISAG.pdf)

The Draft EIR should include or reference information and protocols required pursuant to the "Ventura County Planning Division Standards for Initial Study Biological Assessments" (October 9, 2012), which is available online at:  
<http://www.ventura.org/rma/planning/conservation/bio-report-procedure.html>

3

### 3. Ventura County General Plan

The Draft EIR should analyze the proposed project with respect to its consistency with the Ventura County General Plan Goals, Policies and Programs (2011) environmental goals and policies for biological resources. Several policies in the General Plan support the protection of, and require an evaluation and mitigation of significant impacts to, biological resources for streams and wetlands, such as:

- A 100-foot setback is required from these resources for all discretionary development (Policy 1.5.2-4);
- Discretionary projects must evaluate biological impacts within 300 feet of waters and wetlands (Policy 1.5.2- 3); and
- Unavoidable significant impacts to wetlands or streams cannot be found acceptable with the adoption of a Statement of Overriding Considerations.

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### 4. Comments on Mitigation Measures Proposed

The biological mitigation measures proposed for the Draft PEIR were very thorough. Planning Division staff has a few minor comments as follows:

- **PPM BIO 1 (b).** Where avoidance is determined to be infeasible, the project level mitigation measures define various compensatory mitigation approaches that could be used by a project. For projects occurring within Ventura County, such replacement mitigation should occur as close as possible to the impact site and within the County when possible.
- **PPM BIO 1 (d).** Temporary access roads and staging areas are stated to not be located in non-native habitat. Such facilities and infrastructure should not be located in native habitat.
- **PPM BIO 4 (e).** The County requires a buffer zone of 300 feet around occupied bird nests afforded protection pursuant to the Migratory Bird Treaty Act.
- **PPM BIO 5 (m).** To mitigate or improve the connectivity of wildlife habitats within the project area, the proposed mitigation measure discusses the potential to install wildlife crossings. The PEIR should also consider project areas that have existing infrastructure that may be retrofitted for wildlife crossings for the purpose of mitigation.

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Thank you for the opportunity to comment on the Draft PEIR. If you have questions regarding the information set forth in this memo, please contact Abigail Convery at 805-654-2489 or via email at [Abigail.Convery@ventura.org](mailto:Abigail.Convery@ventura.org).

6

January 24, 2020

Mr. Roland Ok, Senior Regional Planner  
 Southern California Association of Governments  
 900 Wilshire Blvd, Suite 1700  
 Los Angeles, California 90017

**Subject: Draft Program Environmental Impact Report for Connect SoCal (2020-2045  
 Regional Transportation Plan/Sustainable Communities Strategy)**

Dear Mr. Ok:

Thank you for the opportunity to provide input and comments on the Draft Program Environmental Impact Report for Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). The Long Range Section of the Ventura County Planning Division reviewed the Draft Program EIR for the proposed project and provides the following response:

1. **Saticoy Area Plan.** In September 2015, the Ventura County Board of Supervisors adopted a comprehensive update to the Saticoy Area Plan. The Saticoy community is defined as a "severely economically disadvantaged community" and the Saticoy Area Plan has a 20-year time horizon that extends from 2015 to 2035. The Mobility Element within the Saticoy Area Plan identifies implementation program MOB-P2 which prioritizes the widening/re-stripping of SR 118 from Vineyard Avenue to Darling Road.

On January 28, 2016, and February 22, 2019, the Long Range Planning Section submitted comment letters to SCAG in response to Draft RTP/SCS and environmental documents. These letters provided detailed background emphasizing the need for regional cooperation for the construction of these improvements. As such, we respectfully request that the re-stripping and any other critical intersection improvements in the Saticoy area be included in the RTP/SCS or FTIP Projects list as necessary, to make this a priority project.

2. **El Rio/Del Norte Area Plan.** The improvements and project scope identified in the environmental document cover an area of unincorporated Ventura County known as El Rio/Del Norte Area Plan. In the Land Use Section of the area plan, policies have been adopted for land use compatibility. Specifically, the following policies have a potential to be impacted:

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- a. Policy 3.2.2(4) states “Discretionary, non-agricultural land uses adjacent to Agricultural designated land shall be required to establish appropriate buffers as determined by the Agricultural Department.”
- b. Goal 4.1.1 Transportation/Circulation:
  - 1. Ensure adequate circulation and transportation system to serve the needs of the existing and future residents of the El Rio/Del Norte area.
  - 2. Plan for safe pedestrian and bicycle pathways throughout the El Rio/Del Norte area;
  - 3. Encourage the expansion of bus service to serve the El Rio/Del Norte area.

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The Draft Program EIR discusses significant and unavoidable impacts in the Land Use section. **Impact LU-2** “Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect,” results in a significant and unavoidable impact.

At the project level, Long Range Planning staff concurs with **PMM LU-2**, “When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.”

- 3. **Solid Waste.** Table 3.19.1-1 Solid Waste Tonnage within the SCAG Region (2018) identifies both San Bernardino County and Ventura County as having a total tonnage of 1,908,462 for 2018. The linked source of CalRecycle Landfill Tonnage Reports shows Ventura County as having a total tonnage of 1,904,702 for 2018. Although the Total Tonnage figure of 19,550,712 (for the SCAG Region) captures the correct solid waste tonnage figure, the section should be reviewed to ensure accurate citation of solid waste data is used throughout the document.
- 4. **Wastewater and Storm Drainage Facilities.** The County of Ventura has adopted a Habitat Connectivity and Wildlife Corridor Ordinance and identifies bridges and culverts as wildlife crossing structures (section 8109-4.8.3.4 of the Ventura County Non-Coastal Zoning Ordinance). As such, planning staff concurs with the project level mitigation measure of **PMM USWW-1** “...During the design and CEQA review of individual future projects, implementing agencies and project sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility

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*shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project level-review as necessary to provide CEQA clearance for new facilities."*

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If the project results in new or retrofitted infrastructure improvements, the Ventura County Planning Division shall be consulted to ensure the improvements are consistent with the County's zoning ordinance and the adopted Habitat Connectivity and Wildlife Corridor standards. Early consultation with the Planning Division during the project level design phase is encouraged. This request is intended to help streamline the project and prevent revisions to plans or new mitigation measures necessary to comply with the Habitat Connectivity and Wildlife Corridor regulatory standards.

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Thank you again for the opportunity to comment. Should you have any questions about the contents of this letter, please contact me at 805-654-3327 or via email at [linda.blackburn@ventura.org](mailto:linda.blackburn@ventura.org)

Sincerely,



Linda Blackburn, Senior Planner  
Long Range Planning Section  
Ventura County Planning Division

Attachments: January 28, 2016 Environmental Document Review, RMA Ref. #15-024, Draft 2016 RTP/SCS and Program EIR comment letter  
February 22, 2019, Environmental Document Review, RMA Ref. #19-001, Notice of Preparation of a Program Environmental Impact Report (PEIR) for Connect SoCal

RESOURCE MANAGEMENT AGENCY

# county of ventura

Planning Division  
Kimberly L. Prillhart  
Director

February 22, 2019

Mr. Roland Ok, Senior Regional Planner  
Southern California Association of Governments  
900 Wilshire Blvd, Suite 1700  
Los Angeles, California 90017

**Subject: Notice of Preparation of a Program Environmental Impact Report (PEIR) for Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy)(RTS/SCS)**

Dear Mr. Ok:

Thank you for the opportunity to provide input and comments on the Notice of Preparation of a PEIR for Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). The Long Range Planning Section of the Ventura County Planning Division reviewed the Notice of Preparation for the proposed project and provides the following response:

1. **Saticoy Area Plan.** In September 2015, the Ventura County Board of Supervisors adopted a comprehensive update to the Saticoy Area Plan. The Saticoy community is defined as a "severely economically disadvantaged community" and the Saticoy Area Plan has a 20-year time horizon that extends from 2015 to 2035. The Mobility Element within the Saticoy Area Plan identifies implementation program MOB-P2 which prioritizes the re-stripping of SR 118 from Vineyard Avenue to Darling Road.

On January 28, 2016, the Long Range Planning Section submitted a comment letter to Southern California Association of Governments (SCAG) in response to Draft 2016 RTP/SCS and PEIR. This letter provided detailed background emphasizing the need for regional cooperation for the construction of these improvements. As such, we respectfully request that the re-stripping and any other critical intersection improvements in the Saticoy area be included in the RTP/SCS or FTIP Projects list as necessary, to make this a priority project.

2. **Bottom-up Local Growth and Land Use Input Process.** On October 1, 2018 and December 14, 2018, the Ventura County Planning Division provided detailed and comprehensive data and analysis in response to the request for local input. We request that this input be considered as part of the preparation of the environmental document.
3. **Population Growth and Housing Projections.** As part of the scoping for the environmental analysis in the PEIR, we request special consideration be given to protection of farmland and

800 South Victoria Avenue, L# 1740, Ventura, CA 93009 (805) 654-2481 Fax (805) 654-2509



that contaminated sites such as Santa Susana Field Laboratory (SSFL) be excluded from consideration of potential housing sites.

Thank you again for the opportunity to comment. Should you have any questions about the contents of this letter, please contact me at 805-654-3327 or via email at [linda.blackburn@ventura.org](mailto:linda.blackburn@ventura.org)

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Blackburn".

Linda Blackburn, Senior Planner  
Long Range Planning Section  
Ventura County Planning Division

Attachments: Environmental Document Review, RMA Ref. #15-024, Draft 2016 RTP/SCS and Program EIR comment letter dated January 28, 2016



# Memorandum

**County of Ventura • Resource Management Agency • Planning Division**  
*800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • ventura.org/rma/planning*

**DATE:** January 28, 2016

**TO:** Laura Hocking, RMA/Planning Technician

**FROM:** Kari Finley, Senior Planner

**SUBJECT:** Environmental Document Review, RMA Ref. #15-024  
2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS)

We would like to thank the Southern California Association of Governments (SCAG) for the opportunity to review the Draft 2016 RTP/SCS and Program EIR. This memo provides comments on the Draft 2016 RTP/SCS from the Ventura County Planning Division for consideration by SCAG.

In September 2015, the Ventura County Board of Supervisors adopted a comprehensive update to the Saticoy Area Plan. The Saticoy community is defined as a "severely economically disadvantaged community". The Saticoy Area Plan has a 20-year time horizon that extends from 2015 to 2035. Within the Saticoy Area Plan, project objectives are called "guiding principles" that must be used when evaluating future Area Plan amendments. The four guiding principles developed for the Saticoy Area Plan update 1) sustainable development that supports a healthy community, 2) economic revitalization, 3) improved housing opportunities and, 4) improved infrastructure systems. The Area Plan update was primarily funded through a combination of Compass Blueprint Program Grant and the Strategic Growth Council Sustainable Communities Planning Grant Program. Significant planning efforts were focused on reducing vehicle miles travelled.

One of the unavoidable, significant impacts that was identified in the Saticoy Area Plan Program EIR, includes traffic impacts on State Route 118 (SR118) in the Saticoy Community. One potential mitigation measure that was identified includes the widening/re-striping of SR118 in the Saticoy community (e.g., generally between Vineyard Avenue to Darling Road). Although the Board of Supervisors adopted a statement of overriding considerations for this impact, the following implementation program (highlight added) was included in the Area Plan to help mitigate the impact in the future:

No.	Program Description	Responsibility	Priority	Timeframe
<b>MOBILITY ELEMENT</b>				
MOB-P2	<b>Reclassify Portion of SR 118:</b> To mitigate significant project and cumulative traffic impacts on SR 118 between Vineyard Avenue and Darling Road, the County should review and process a General Plan Amendment that would reclassify that segment of SR 118 from 4 to 6 lanes on the Regional Road Network. The road reclassification should be incorporated into the next General Plan Update, tentatively scheduled for completion in 2020. Finally, the County shall work with VCTC and Caltrans to reprioritize the re-striping of SR 118 from Vineyard Avenue to Darling Road on the Ventura County Congestion Management Plan and the Caltrans list of projects. Although the re-striping project is currently listed in the Congestion Management Plan, the prioritization and timing for construction should be modified to occur within the 20-year horizon of the Saticoy Area Plan.	<b>PWA/ Transportation;</b> RMA/Planning; VCTC; Caltrans; City of Ventura	A	0-5 years

As indicated in the adopted Saticoy Area Plan program, it is critical for implementation of the recently adopted Saticoy Area Plan and future development in the Saticoy community that the re-striping project be included as a prioritized project in the 2016 RTP/SCS (FTIP Projects). The Saticoy Area Plan guiding principles are consistent with the RTP/SCS overarching strategy that calls for “more compact communities in existing urban areas”. The Saticoy Area Plan includes a land use plan with more compact development and improved mobility in an existing urban area. Peak-hour traffic impacts are already significant in this area and will impede future revitalization of this disadvantaged community if improvements to SR118 are not constructed.

As such, we respectfully request that the re-striping and any other critical intersection improvements in the Saticoy area be included in the RTP/SCS or FTIP Projects list as necessary, to make this a priority project. If you have any questions concerning these comments, you may contact Kari Finley at [kari.finley@ventura.org](mailto:kari.finley@ventura.org) or 805/654-3327.





**WATERSHED PROTECTION**  
WATERSHED PLANNING AND PERMITS DIVISION  
800 South Victoria Avenue, Ventura, California 93009  
Sergio Vargas, Deputy Director – (805) 650-4077

**M E M O R A N D U M**

**DATE:** December 6, 2019  
**TO:** Anthony Ciuffetelli, RMA Planner  
County of Ventura  
**FROM:** Sergio Vargas, Deputy Director *S.V.*  
**SUBJECT:** RMA19-001 NOP of PEIR 2020-2045  
Watershed Protection District Project Number: WC2019-0008

Pursuant to your request dated November 18, 2019, this office has reviewed the submitted materials and provides the following comments.

**PROJECT LOCATION:**

The SCAG region consists of six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura), and 191 cities (Figure 1, *SCAG Region*). To the north of the SCAG region are the counties of Kern and Inyo; to the east is State of Nevada and State of Arizona; to the south is the county of San Diego; and to the northwest is the Pacific Ocean. The SCAG region also consists of 15 sub-regional entities that serve as partners in the regional planning process

**PROJECT DESCRIPTION:**

Pursuant to federal and state planning requirements, SCAG updates and adopts a long-range regional transportation plan every four years. SCAG's last Plan was adopted in 2016 and an updated Plan is required to be adopted by April 2020.

Connect SoCal will outline the region's goals and policies for meeting current and future mobility needs, provide a foundation for transportation decisions by local, regional and state officials that are ultimately aimed at achieving a coordinated and balanced transportation system. Connect SoCal will also identify the region's transportation needs and issues, recommended actions, programs, and a list of projects to address the needs consistent with adopted regional policies and goals, and document the financial resources needed to implement Connect SoCal. It is important to note that SCAG does not implement individual projects in the RTP, as they will be implemented by local and state jurisdictions, and other agencies.

**COMMENTS:**

For each specific project considered, the environmental impacts for three areas of concern must be considered.

**Impacts to Watershed Protection District Facilities and Jurisdictional Channels:**

Each project analyzed under the proposed program must consider the impacts to facilities owned or under the jurisdiction of the Ventura County Watershed Protection District. Any projects in, on, over, under, or across a District jurisdictional channel or within District right-of-way would require a permit from the Ventura County Watershed Protection District consistent with District policy and Ordinance WP-2.

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In planning future projects from a programmatic standpoint. The environmental documents should include a requirement that each project under the program must consider current and future flows for any projects that cross redline channels or other major waterways.

**Hydraulic Hazards FEMA:**

Each project analyzed under the proposed program must consider if the project is located in a special flood hazard area (SFHA) shown on either the effective or preliminary flood hazard mapping as prepared by the Federal Emergency Management Agency (FEMA). Project considered within the SFHA must obtain a permit from the Ventura County Public Works Agency and meet project specific requirements to mitigate impacts from flooding.

3

**Costal Hazards and Sea Level Rise:**

If a project is proposed in a Coastal Zone costal hazards and the impacts sea level rise must to be considered consistent with the California Coastal Commission and the Ventura County General Plan Policies.

4

**END OF TEXT**

If you have any questions, please feel free to contact Nathaniel Summerville by email at [Nathaniel.Summerville@ventura.org](mailto:Nathaniel.Summerville@ventura.org) or by phone at (805) 477-1967.





**CITY OF COSTA MESA**

P.O. BOX 1200 • 77 FAIR DRIVE • CALIFORNIA 92628-1200

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LOC-4

January 24, 2020

Southern California Association of Governments  
Connect SoCal Team  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

Dear Connect SoCal Team:

The City of Costa Mesa appreciates the time and effort undertaken by the Southern California Association of Governments (SCAG) staff in its efforts to develop a RTP/SCS of our large and diverse metropolitan planning area. The City of Costa Mesa remains committed to doing its fair share in addressing regional issues and appreciate the comment and review period provided by SCAG for the Connect SoCal Plan and its associated PEIR.

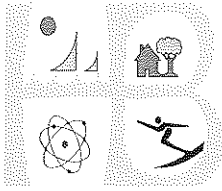
The City would like to express its support of recommendations and comments submitted by the Orange County Council of Governments, Orange County Transportation Authority, and Center for Demographic Research. We strongly recommend that all comments and concerns from these bodies be implemented into the Connect SoCal Plan and the associated PEIR.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry Curtis".

Barry Curtis, AICP  
Director of Economic and Development Services





# City of Huntington Beach

2000 MAIN STREET

CALIFORNIA 92648

## DEPARTMENT OF COMMUNITY DEVELOPMENT

Planning Division

714.536.5271

Code Enforcement Division

714.375.5155

Building Division

714.536.5241

January 23, 2020

Draft Connect SoCal PEIR Comments  
Attn: Roland Ok  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017

Submitted via email to: [2020PEIR@scag.ca.gov](mailto:2020PEIR@scag.ca.gov)

**RE: CITY OF HUNTINGTON BEACH DRAFT CONNECT SOCIAL AND PEIR COMMENT LETTER**

Dear Mr. Ok,

Thank you for the opportunity to submit comments on the Draft Connect SoCal plan and Program EIR. The City of Huntington Beach appreciates SCAG’s public outreach efforts for this process and offers the following comments and concerns for your consideration.

1

**High Quality Transit Areas (HQTAs)**

HQTAs are defined as “corridors that have at least a fifteen minute headway (time in between the next scheduled service) during peak hours bus service.” According to RTP/SCS maps, all of Beach Boulevard within the City of Huntington Beach is defined as a HQTAs. However, based on the October 13, 2019 Orange County Transportation Authority (OCTA) Bus Schedule<sup>1</sup>, there are no bus stops on Beach Boulevard within the City of Huntington Beach with headway times of 15 minutes or less. Route 29 services Beach Boulevard from the City of La Habra to PCH in Huntington Beach. The shortest headway time during peak hours for bus service is on the Route 29 stop at PCH/1<sup>st</sup> Street (not a stop on Beach Boulevard) traveling southbound with an average headway time of 18.23 minutes during the PM peak hours. Most stops have an average peak hour headway time of approximately 19-25 minutes. Some stops, such as the Beach Boulevard/Talbert Avenue stop, have peak hour headway times of 40-49 minutes. One stop (Beach Boulevard/Atlanta Avenue) did not list any stop times as part of any route for this stop. It must also be noted that OCTA eliminated Route 211 in October 2019, which serviced Huntington Beach to Irvine (a major Orange County job center) due to low ridership.

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<sup>1</sup> OCTA Bus Book <http://www.octa.net/ebusbook/CompleteBusBook.pdf>

Further, OCTA's 2018 Long Range Transportation Plan (LRTP)<sup>2</sup> includes Figure 4.1 – *Local, Community, and Bravo! Final Route Recommendations*. This figure recommends that Route 29 receive a reduction in frequency of service. This will add further delay to the 19-25 minute average peak hour headway service times on Beach Boulevard.

2

The Connect SoCal Plan and PEIR must utilize practical application of HQTAs as they operate and are planned for in order to implement the statute objectives of the RTP/SCS, including promoting an improved intraregional relationship between jobs and housing. The City of Huntington Beach recommends revising the HQTAs throughout Connect SoCal and the PEIR to accurately reflect available data regarding actual bus service and planned bus service on Beach Boulevard. Based on SCAG's definition of a HQTA, the entire length of Beach Boulevard in Huntington Beach does not qualify as a HQTA and must be adjusted accordingly.

The Connect SoCal Plan and PEIR also include other transportation related errors in Orange County, as identified by comments made by OCTA. The City of Huntington Beach expresses support for OCTA's comments as they pertain to errors and inconsistencies between the existing and planned Orange County transportation network and the RTP/SCS and PEIR. For example, the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. The potential regional express lane network is currently subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility. Additionally, Connect SoCal regional strategies rely on improvements beyond the projects submitted by OCTA, and implementation of the strategies is subject to availability of new revenue sources, necessary project development, and review processes by the implementing agencies.

3

#### *RHNA Growth Exceeds General Plan Growth*

Section 3.14 – Population and Housing of the Connect SoCal PEIR includes four guiding principles related to Growth Forecasts approved by SCAG's Regional Council on August 1, 2019:

Principle #1: The draft plan forecast for Connect SoCal shall be adopted by the Regional Council at the jurisdictional level, thus directly reflecting the employment, population and household growth projections derived from local input and previously reviewed and approved by SCAG's local jurisdictions. The draft plan growth forecast maintains these projected jurisdictional growth totals, **meaning further growth is not reallocated from one local jurisdiction to another.**

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Principle #2: The draft plan forecast at the Transportation Analysis Zone (TAZ) level is **controlled to be within the density ranges of local general plans or input received from local jurisdictional** in this most recent round of review.

<sup>2</sup> OCTA Long Range Transportation Plan, Figure 4.1 <http://www.octa.net/pdf/OCTALRTP111618FINAL.pdf>

Principle #3: For the purpose of determining consistency for California Environmental Quality Act (CEQA) streamlining, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the Plan.

Principle #4: TAZ level data or any data at a geography smaller than the jurisdiction is included in the draft plan forecast only to conduct the required modeling analytical work and is therefore, only advisory and non-binding as SCAG's sub-jurisdictional forecasts are not formally adopted as part of the Plan.

The SCAG RHNA methodology is inconsistent with Principle #1 and #2. The currently proposed draft 6<sup>th</sup> Cycle RHNA methodology reallocates "residual" existing need across jurisdictions within the same county. The reallocation is assigned to jurisdictions based on transit accessibility (50%) and job accessibility (50%), and excludes Disadvantaged Community jurisdictions which have over 50% of their populations in very low resource areas using California Tax Credit Allocation Committee (TCAC)/HCD Opportunity Indices.

Further, the cumulative impacts of the reallocation, projected need, and existing need result in a total RHNA that exceeds 1.0368 times planned household growth from the SCAG region<sup>3</sup>. While 1.0368 is the overall exceeded household growth in the region, each jurisdiction may be given a RHNA allocation that exceeds their General Plan growth even further as a result of the reallocated "residual" existing need calculation.

The PEIR also states that although the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process. The PEIR does not provide any meaningful analysis or supporting evidence to demonstrate how this will be accomplished. The currently proposed draft 6<sup>th</sup> Cycle RHNA methodology which includes reallocated "residual" need and growth exceeding SCAG local jurisdiction General Plan forecasts is not consistent with the goals of Connect SoCal, including the following:

Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods

Goal 4. Increase person and goods movement and travel choices within the transportation system

Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.

The City of Huntington Beach is unable to accommodate any reallocated growth due to a lack of transportation options, which is not consistent with Connect SoCal Goals 2, 4, or 9. As a result, the SCAG RHNA methodology is wholly inconsistent with Connect SoCal and the PEIR must address this information.

<sup>3</sup> SCAG 6<sup>th</sup> Cycle RHNA Draft Allocation Methodology November 7, 2019  
<http://www.scag.ca.gov/programs/Documents/RHNA/RHNA-Draft-Methodology.pdf>

Support for Comments and Recommendations Submitted by Other Groups

The City of Huntington Beach expresses support for comments made by OCTA as they pertain to errors and inconsistencies between the existing and planned Orange County transportation network and the RTP/SCS and PEIR, as noted above. The City also expresses support for comments made by the Center for Demographic Research (CDR) and the Orange County Council of Governments (OCCOG). The City would like to highlight the following comments from CDR and OCCOG that are of the highest level of concern:

1. SCAG must utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected for the RTP/SCS and PEIR.
2. CDR PEIR comments #33, #35, and #54 to add the following text: "SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG's total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG's population projections."
3. CDR RTP/SCS and OCCOG comments which revise text to maintain an objective/unbiased tone, delete sensationalized language, and include meaningful evidence to support generalized claims about the SCAG region.
4. OCCOG comments to revise the definition of a HQTAs used in the RTP/SCS and RHNA to be consistent with the definition of a HQTAs in SB 375 and the Strategic Growth Council. This is necessary to ensure the SCAG region is able to compete for available funds related to transit-oriented housing.
5. OCCOG comments opposing any alternative in the PEIR that does not utilize local input, including the intensified land use alternative. The RHNA must be consistent with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).
6. OCCOG PEIR comments regarding the usage of "can and should" in mitigation measures. Revise all mitigation measures to be "considered where applicable and feasible" to clarify that these mitigation measures are a menu of options and not

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requirements. Further, any mitigation measure that includes a new fee or tax to be adopted at the jurisdictional level must be revised to clarify that it is an option for implementation and not a requirement. Also clarify whether the assumed revenue from the suggested new fees were included in the financial plan or economic analysis of the RTP/SCS.

10

Conclusion

Thank you for the opportunity to comment on the Draft Connect SoCal plan and Program EIR. The City of Huntington Beach appreciates SCAG's commitment to a fair and transparent process and will continue to be an active participant during the RTP/SCS update and 6th cycle RHNA process.

11

Sincerely,



Nicolle Aube, AICP  
Associate Planner

Cc: Ursula Luna-Reynosa, Director of Community Development  
Jennifer Villasenor, Deputy Director of Community Development  
Jane James, Planning Manager







January 24, 2020

Draft Connect SoCal Plan Comments  
 ATTN: Connect So Cal Team  
 Southern California Association of Governments  
 900 Wilshire Blvd., Suite 1700  
 Los Angeles, CA 90017

**RE: PUBLIC REVIEW AND COMMENT ON THE DRAFT CONNECT SOCIAL PLAN (2020-2045 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY) AND PROGRAM ENVIRONMENTAL IMPACT REPORT.**

Connect So Cal Team,

Thank you for providing the City of Indio's Planning Division the opportunity to review and comment on the draft Connect SoCal plan (also known as the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy or RTP/SCS). After reviewing the information provided, comments pertaining to the draft Connect SoCal document and draft Program Environmental Impact Report the following updates and comments are being provided for consideration:

1

**I. General Plan Update**

In response to Table 3.8-4 *California Jurisdiction Addressing Climate Change in the SCAG Region (2019)* on the Draft Program EIR we would like to provide and update for the three items that were (IP) In Progress (1) GHG Reduction Plan, (2) Climate Action Plan, and (3) General Plan Policy. On September 18, 2019 the City Council approved the City of Indio 2040 General Plan Update (Resolution No. 10107) and Climate Action Plan (Resolution No. 10108). The General Plan addresses the mandatory elements required by state law that are Land Use, Housing, Circulation (Mobility), Conservation, Noise, Open Space and Environmental Justice. It also includes optional elements of Community Facilities and Infrastructure, Health and Equity (inclusive of Environmental Justice), Economic Development and Implementation. The Climate Action Plan establishes the City's goals for addressing and implementing measures consisting of policies, programs, and/or plans to achieve emissions reductions that would meet or exceed the established GHG reduction targets. The three items on the table mentioned

2

above can be updated to (A) Adopted with the addition of the General Plan Implementation Measures.

Below are current City projects aimed to reduce GHG emissions, encourage active transportation, and integrate shared mobility.

2

## **II. Multi Modal Hub Feasibility Study**

The City applied to Caltrans for a Sustainable Planning Grant. The grant analyzed and evaluated fifteen (15) sites for a future Multi-Modal Hub site in the City of Indio. Furthermore, in collaboration with RCTC and Caltrans the feasibility study identified the selected site for use for passenger rail services. The passenger rail route is being planned as Special Events Train to operate between Los Angeles Union Station and Indio. The Special Events Train will serve the Coachella Valley Music and Arts Festival and Stagecoach Festival. The feasibility study looks at existing and proposed transportation system to provide multi-modal services such as park-and-ride, transit connections, bikeshare. The study includes site development, management and operations, maintenance, costs and funding. The Multi Modal Hub Feasibility Study is planned to be completed and adopted by February 2020.

3

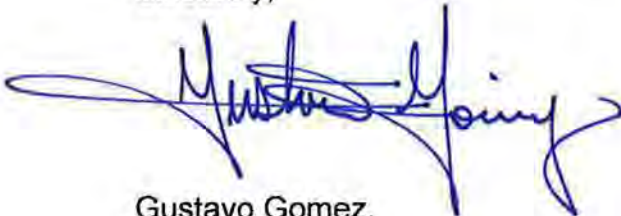
## **III. Complete Streets Plan**

The City of Indio 2040 General Plan's Mobility elements outlines the goals and objectives for the Complete Streets Master Plan. The purpose of the Complete Streets Plan is to enhance connectivity across all travel modes. Although the City of Indio has over 20 miles of existing bikeways and various miles of existing sidewalks, there are still critical connectivity gaps for both bicyclists and pedestrians. As part of this project, transit, bicycle, and pedestrian connectivity improvements identified in the Mobility Element are being reviewed in the Complete Streets Plan to identify remaining connectivity gaps and identify projects to address these gaps. The Complete Streets Master Plan is expected to be completed by early 2020.

4

Thank you for your consideration of these comments. Should you have any questions please feel free to contact me at (760) 391-4064.

Sincerely,



Gustavo Gomez,  
Assistant Planner



January 24, 2020

Mr. Kome Ajise  
Executive Director  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, California 90017  
[ConnectSoCal@scag.ca.gov](mailto:ConnectSoCal@scag.ca.gov)

**Subject: Comments on Connect SoCal, the Draft 2020 Regional Transportation Plan/Sustainable Communities Strategy and Draft Program Environmental Impact Report**

Dear Mr. Ajise:

The City of Irvine appreciates the opportunity to review and provide comments on Connect SoCal, the Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) and the Draft Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a significant effort and the City of Irvine recognizes that the documents are critical to the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction targets and other air conformity standards.

The following general comments and recommendations are offered by the City of Irvine on the 2020 RTP/SCS, associated appendices, and PEIR. In support of this letter, please find attached more specific detailed comments from the City of Irvine that are consistent with the comments provided by the Orange County Council of Governments (OCCOG) and the Center for Demographic Research (CDR) at California State University Fullerton. The City of Irvine requests that this letter and all of its attachments be included in the public record as our collective comments on the 2020 RTP/SCS, PEIR, all associated appendices and documents, and online inventory of maps.

1. The City of Irvine concurs with the Orange County Council of Governments (OCCOG) and the Center for Demographic Research (CDR) at California State University Fullerton

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The City of Irvine concurs with the comments SCAG will receive from the OCCOG and the CDR. The City requests that SCAG respond to all of the comments detailed in the OCCOG and CDR letters and to act upon any changes advocated by OCCOG, of which the City is a member agency.

2

2. 2020 RTP/SCS Growth Forecast

The City of Irvine greatly appreciates the close coordination between SCAG and CDR on behalf of the City of Irvine to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; projects recently completed or under construction; open space; and general plan densities.

Additionally, the City of Irvine supports a growth forecast that is adopted at a geographic level no lower than the jurisdictional level. The City of Irvine provided SCAG with a detailed and accurate land use dataset and growth forecast during its eighteen (18) month Bottom-Up Local Input and Envisioning Process and through the submission of the 2018 Orange County Projections (OCP-2018) dataset.

3

On December 11, 2019, CDR provided SCAG with the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of the City of Irvine and all other Orange County jurisdictions. The technical corrections ensure the final 2020 RTP/SCS growth forecast accurately reflects entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities. On January 8, 2020, CDR requested, on behalf of the City of Irvine and all other Orange County jurisdictions, a copy of the final draft growth forecast dataset to confirm that all the technical corrections have been included in the final 2020 RTP/SCS growth forecast. On January 14, 2020, CDR was informed that SCAG would not provide a copy of the final draft growth forecast to CDR for review until mid-February 2020.

**It is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space, development agreements, and entitlements are properly reflected.**

The City of Irvine opposes any alternative in the PEIR that does not utilize local input, or at the very least, the jurisdictional totals provided through the local input process should be used. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note the failure to rely on accurate jurisdictional-level data divorces the 2020 RTP/SCS from the methodology proposed in the RHNA as required by

4

Government Code Section 65080 (b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final 2020 RTP/SCS.

4

3. High Quality Transit Area (HQTA)

The alignment of SCAG's Regional Housing Needs Assessment (RHNA) and RTP/SCS documents is required by Government Code Section 65080 (b)(2)(B) and Section 65584.04(m). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." The City of Irvine has expressed concern throughout the RHNA methodology development process with the utilization of the Interstate 5 Bus Rapid Transit (BRT) corridor. The HCD approved RHNA methodology identifies three station stops within the City of Irvine, however, the Interstate 5 BRT project and the three station stops have not been approved or vetted by the City and are not certain. The City of Irvine requests that the station stops within the City of Irvine or potential references to them be removed from the RTP/SCS.

5

4. Remain Neutral on Technology

Throughout the documents, there are specific examples of technology identified. It is not SCAG's purview to pick winners and losers in technology; the marketplace will determine dominant technologies. Therefore, it should be noted that these are only examples and that future technologies should not be ignored or excluded from meeting the goals of the RTP/SCS. This will allow the document, including mitigation measures, to be more inclusive and responsive to changing technological advances.

6

5. Maintain Unbiased, Objective Tone

Language throughout the draft 2020 RTP/SCS, the PEIR, and the associated appendices has a tendency to be leading and dramatic in its emphasis of certain key issues, such as active transportation, public health, and land use policy. While these issues are important, using opinion-based and emotionally-charged language is inappropriate in this context.

7

SCAG should remove, wherever applicable, opinion and biased descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Enclosure 1.

6. “Can and Should”

As indicated in the PEIR, state law provides that it is appropriate to indicate in mitigation measures that they “can and should” be implemented where the authority to implement the measure rests with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies’ regulatory measures. The City of Irvine recognizes SCAG’s use of the words “can and should” are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of Senate Bill 375 (SB 375) upon respective local agencies’ land use authority, the City of Irvine deems any language seemingly imposing affirmative obligations contrary to SB 375 inappropriate. As such, the use of the language “can and should” for mitigation measures addressed to local agencies is overreaching.

The City of Irvine recommends SCAG change all language in all project level mitigation measures to read “~~can and should~~ consider where applicable and feasible.” This change will clarify that the project level mitigation measures are a menu of options.

7. Duplicative/Existing Regulations

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact, and the significance of the impact should be looked at after all existing regulation is applied. Mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice, when compliance is used as a mitigation measure, to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with

existing federal, state, and local laws and regulations. Similar language is included in some mitigation measures.

9

8. Cities vs. Jurisdiction

Throughout the 2020 RTP/SCS, PEIR, and associated appendices, there are references to “cities”. Since the SCAG region also includes counties, it is recommended that references to “city” or “cities” are changed to “jurisdiction” or “jurisdictions” where appropriate.

10

9. Spell out Acronyms Prior to Using Abbreviations

There are many different abbreviations used throughout the documents. To avoid confusion and help persons unfamiliar with technical jargon, spelling out the acronyms prior to using them for the first time is common; however, this is often missing in the 2020 RTP/SCS documents.

11

10. Provide Sources for All Graphics and Tables

When a report of such complexity as the 2020 RTP/SCS is produced, it is common for tables, maps, and other graphics to be used or referred to in a manner that could divorce them from the context in which they are presented. For instance, someone may come upon a chart that explains a topic they are reaching and could download the image separate and apart from the technical explanation accompanying it in the electronic version of the document. Without source information embedded in the graphic, information can be spread without proper attribution. The City of Irvine understands that it may “look cleaner” to not include a source, date, and citation for data but best practices for technical reports include adding sources to all graphics.

12

11. Fees and Taxes

Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, therefore, it should not be assumed that they will be approved.

13

The City of Irvine recommends that SCAG reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. SCAG should also clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

The City of Irvine appreciates your consideration of all comments provided in this letter and enclosure and looks forward to your responses. It is a shared goal to have a Regional Transportation Plan and Sustainable Communities Strategy adopted by the April 2020 deadline that represents the best in regional planning developed collaboratively with local jurisdictions and stakeholders in a manner that is credible and defensible on all levels. If you have any questions, please do not hesitate to call me.

14

Sincerely,



Pete Carmichael  
Director of Community Development

Enclosure: Detailed Comments on the 2020-2045 RTP/SCS, PEIR, and Related Appendices – City of Irvine

cc: John Russo, City Manager  
Marianna Marysheva, Assistant City Manager  
Michelle Grettenberg, Deputy City Manager  
Mark Steuer, Director of Public Works and Transportation  
Jaimee Bourgeois, Deputy Director of Transportation  
Tim Gehrich, Deputy Director of Community Development  
Kerwin Lau, Manager of Planning Services  
Melissa Dugan, Supervising Transportation Analyst  
Marika Poynter, Principal Planner  
Marnie Primmer, Executive Director, OCCOG (email)  
Deborah Diep, Director, Center for Demographic Research (email)





City of La Habra

*"A Caring Community"*

LOC-8

COMMUNITY DEVELOPMENT

110 E. La Habra Boulevard  
Post Office Box 337  
La Habra, CA 90633-0785  
Office: (562) 383-4100  
Fax: (562) 383-4476

December 19, 2019

Southern California Association of Governments  
Attn: Roland Ok  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, California 90017

Re: Draft Connect So Cal Program Environmental Impact Report Comments

Dear Mr. Ok,

Thank you for the opportunity to review the "Draft Connect So Cal Program Environmental Impact Report". As you are aware, the California Environmental Quality Act allows potentially affected agencies to comment on proposed projects that may cause significant environmental impacts to their community. Given the nature of the project, the following are our concerns and comments:

#### DOWNLOADS

Draft Connect SoCal Plan- No comments.  
Chapter 0: Making Connections- No comments.  
Chapter 1: About the Plan- No comments.  
Chapter 2: SoCal Today- No comments.  
Chapter 3: A Path to Greater Access, Mobility and Sustainability- No comments.  
Chapter 4: Paying our Way Forward- No comments.  
Chapter 5: Measuring our Progress- No comments.  
Chapter 6: Looking Ahead- No comments.  
Glossary: No comments.

#### TECHNICAL REPORTS

##### Active Transportation-

Page 19. Discuss why Figure 7 and Figure 9 are different but with the same title.  
Page 42. Figure 27- The graph is difficult to interpret. The Y-Axis is speed and the X-Axis appears to be percentages. It has been proven that higher speeds cause more injuries and deaths but this particular graph does not make sense. The Y-Axis appears to be a percentage...a percentage of what?  
Page 51. Figure 30- Some of the colors appear to be the same. Please use different colors so that the data can be understood.  
Page 99. Don't "fade" the north Orange County area. Show the entire County including the La Habra and Brea area. The header can be relocated to another location on the page.

Connect SoCal PEIR  
12/19/19  
Page2

Aviation and Airport Ground Access- No comments

Congestion Management- No comments

Congestion Management- Appendix 1

Page 2. Define SOV (Single Occupancy Vehicle)

Demographics and Growth Forecast- No comments

Economic and Job Creation Analysis

Page 4. There needs to be discussion bringing Los Angeles Metropolitan Transit Authority (METRO) facilities into Orange County. METRO and Orange County Transportation Authority (OCTA) need to start discussing this soon if they have not already.

Emerging Technology- No comments.

Environmental Justice- No comments.

Goods Movement

Page 116, Exhibit 25- Title obstructs Collision Density data. Please relocate the Title.

Page 128- The Burlington Northern Santa Fe Railroad has already adopted design standards to accommodate future electrification of their rail system by requiring addition clearance for new overhead bridges over their tracks.

Highways and Arterials

Page 21, The I-405 Project between State Route 73 and I-605 is already underway. The completion year stated in the document is 2026. Is this completion date correct?

Natural and Farm Lands Conservation- No comments.

Passenger Rail- No comments

Performance Measures- No comments.

Project List- No comments

Public Health- No comments

Public Participation and Consultation- No comments.

Sustainable Communities Strategy- No comments.

Sustainable Communities Strategy- Appendix 1- No comments.

Transit

Page 32, Exhibit 7- The High-Quality Transit Corridors don't appear to match maps in previous Exhibits (Passenger Rail). One shows a High-Quality Transit Corridor along Harbor Boulevard and the other one does not.

Transportation Conformity Analysis- No comments.

Transportation Finance- No comments.

Transportation Safety and Security

Page 56, Mitigation is spelled wrong in the Title on the right side of the page. Please check the second sentence under this same Title. I think the sentence should read "Very large earthquakes ( $M > 7.5$ ) on the San Andreas Fault are both the most uncommon and potentially the most devastating to the region and the nation." These types of large earthquakes are not the most common type of earthquakes in Southern California.

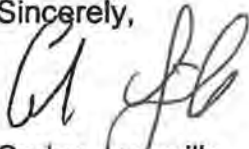
Transportation Safety and Security- Appendix 1- No comments.  
Connect SoCal PEIR  
12/19/19  
Page 3

Transportation Safety and Security- Appendix 2- No comments.

We are prepared to assist you in addressing the above concerns. We would request that a copy of the draft environmental impact report be forwarded to the City where modified to address the City's concerns for review and comment. Additional comments may be generated based on that review.

If you should have any questions concerning the comments, please feel free to contact Mr. Chris Johansen, P.E., City Engineer at (562) 383-4151.

Sincerely,



Carlos Jaramillo  
Deputy Director of Community Development

cc: Andrew Ho, Director of Community Development  
Chris Johansen, P.E., City Engineer





## CITY OF LAGUNA HILLS

January 24, 2020

Delivered Electronically

Mr. Kome Ajise, Executive Director  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 9001

Re: City of Laguna Hills Comments for Connect SoCal; 2020 RTP/SCS and PEIR

Dear Mr. Komise:

The City of Laguna Hills appreciates SCAG's efforts to address complex regional issues and to collaboratively plan with local jurisdictions. The City of Laguna Hills respectfully provides the comments below concerning SCAG's 2020 RTP/SCS known as Connect SoCal (the Plan).

### Local Input

The City supports the use of data provided to SCAG on behalf of the City by Cal State Fullerton's Center for Demographic Research (CDR) via OCP-2018. At this time the City understands that CDR has not yet been given the opportunity to review the final RTP/SCS growth forecast. The City does not support any intensification of the City's land uses in the proposed RTP/SCS beyond the local input provided in OCP-2018.

### Interstate 5 (I-5) High Quality Transit Area (HQTA) Proposal – South Orange County

The City is perplexed by the Plan's proposal to designate I-5 in south Orange County as a High Quality Transit Area. The Plan refers to HQTAs as corridor-focused growth areas within one half mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. No such transit access currently exists anywhere in south Orange County, and based on the City's understanding of the Orange County Transportation Authority's (OCTA) operations, no such transit access is contemplated. Without the appropriate supporting transit, an HQTA designation for I-5 is not justified.

Nearly 360,000 motorists travel the I-5 daily in South Orange County, and volumes are expected to grow 25 percent by 2045 (OCTA, 2019). Increasing higher intensity housing uses along the I-5 will merely add congestion without reducing per capita VMT since limited transit alternatives

for commuting to job centers exist for South County residents. While OCTA and CalTrans are working to implement various widening projects to improve capacity of the I-5, there are no plans associated with CalTrans or OCTA projects to add any infrastructure typically associated with an HQTAs. In addition, a substantial portion of the land area adjacent to I-5 in south Orange County is constrained by steep slopes, flood control improvements, rail infrastructure, water and sewer infrastructure, and open space. There may be pockets of areas that exist along the I-5 that could arguably transition to higher intensity land uses under the Plan (such as near existing Transit Priority Areas), but these pocket growth areas do not justify the designation of the entire I-5 corridor as an HQTAs. Therefore, the City requests that the HQTAs designation be revised on the I-5 corridor to extend no further south than El Toro Road. The City believes revising the HQTAs in this manner is appropriate given a variety of land use and planning factors that exist in the area. These factors lend themselves to supporting a transition to higher intensity land uses contemplated by the Plan in the City of Laguna Hills.

Sincerely,



David Chantarangsu  
Community Development Director  
City of Laguna Hills

Candice Vander Hyde – City of Lancaster, Management Analyst

To Whom It May Concern.

After reviewing the projects listed in the Connect SoCal PEIR document, the City of Lancaster would like to submit to you that there are two of our projects missing from the project listing. The following are the TIP IDs and Titles for the missing projects:

- LA9918789: 10<sup>th</sup> Street West and Avenue J Improvements
- LAMP16S001: 10<sup>th</sup> Street West Road Diet & Bikeway Improvements





CITY OF LOS ANGELES  
INTER-DEPARTMENTAL MEMORANDUM

Date: January 16, 2020

To: Honorable City Council  
c/o City Clerk, Room 395  
Attention: Honorable Mike Bonin, Chair, Transportation Committee

From: *for* Seleta J. Reynolds, General Manager *[Signature]*  
Department of Transportation

Subject: **Draft Connect SoCal (2020 Regional Transportation Plan / Sustainable Communities Strategy)**

**SUMMARY**

This report recommends that the City Council authorize the Los Angeles Department of Transportation (LADOT) to submit comments on behalf of the City of Los Angeles (City) to the Southern California Association of Governments (SCAG) on the draft Connect SoCal Plan (2020 Regional Transportation Plan/Sustainable Communities Strategy).

**RECOMMENDATION**

1. APPROVE the comments provided in this report to be submitted on behalf of the City in response to the draft SCAG Connect SoCal Plan.
2. DIRECT LADOT to transmit comments to SCAG that are substantially consistent with those contained in this report.
3. DIRECT LADOT to work with SCAG to incorporate the comments into the Final Connect SoCal Plan and related Programmatic Environmental Impact Report (Program EIR).

1

**BACKGROUND**

Every four years, the Southern California Association of Governments prepares a Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the six-county region. The draft 2020 RTP/SCS, Connect SoCal, includes planned transportation projects and demographic projections through 2045. Connect SoCal presents a strategy for investing \$638 billion into the region's transportation network over the next 25 years and a Sustainable Communities Strategy (SCS) for the six-county region.

Required by SB 375, the SCS focuses on reducing greenhouse gas (GHG) emissions from vehicles and light trucks by integrating land use and transportation planning, expanding transit, implementing transportation demand management, and leveraging new transportation technologies to reduce vehicle trips. The California Air Resources Board (CARB) set a regional GHG emissions reduction target for the SCAG region. The target addressed by the draft Connect SoCal Plan is to reduce GHG emissions eight percent below 2005 per capita emission levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. In addition to the regional target, CARB indicates a 25 percent GHG reduction is needed

2

by 2035 in order to meet the State’s climate action goals. While SCAG anticipates the implementation of Connect SoCal will achieve both the 2020 and 2035 GHG reduction targets, the plan’s Program Environmental Impact Report (Program EIR) indicates that Connect SoCal is not forecasted to achieve the reductions that CARB has determined necessary to meet the State’s climate action goals. Connect SoCal’s inability to meet the statewide reduction target may inhibit cities from relying on the plan. While it may be infeasible to consider a scenario that meets the more aggressive statewide target, SCAG should continue to partner with state and local agencies to pursue innovative solutions that reduce regional vehicle miles traveled (VMT) and resulting greenhouse gas emissions. These strategies may need to reach beyond traditional land use policies involving growth forecasting, and additionally consider market solutions like roadway pricing, broad scale fleet electrification, electric charging infrastructure, and new transportation technology partnerships that fundamentally alter the incentives for drive-alone trips.

2

SCAG could further support lowering regional VMT by leading a regional VMT reducing credit system, or ‘VMT exchanges’ similar to cap and trade markets. VMT exchanges could enable more sustainable outcomes throughout the six-county region by collecting off-set credits to reinvest in sub-regionally managed programs, like subsidizing transit passes for students. Metro has already demonstrated that such programs can lower the demand to drive alone. These investments could also potentially reverse the national trend of falling transit ridership. We are supportive of innovative strategies in the SCAG mitigation measures listed on page 3.17-62 to 3.17-64 of the Program EIR, and offer to be an active partner in these efforts.

SCAG recently conducted a series of workshops across the region, including in-depth graphic and narrative presentation materials. The City appreciates the outreach effort, both to the City and across the region.

3

Following the release of the draft Connect SoCal Plan on November 7, 2019, LADOT reviewed the draft plan and compiled the proposed comments to SCAG. The discussion included in this memo represents comments and concerns related to LADOT’s goals and strategies.

## **DISCUSSION OF POLICY CONCERNS AND COMMENTS**

### Policy and Planning Framework

Since the adoption of the 2016 RTP/SCS, the City of Los Angeles adopted several plans and policies that further the legislative framework that informs the Connect SoCal. We are pleased to see SCAG acknowledge the City’s Mobility Plan 2035 as a substantial advancement since the adoption of the 2016-2040 RTP/SCS. The Mobility Plan 2035 fundamentally shifted the City’s priorities by adopting goals that include designing for safety first, building a world class infrastructure with a ‘complete streets’ planning framework, access for all Angelenos, more collaboration and informed choices, and a clean environment and health community. These goals align with the goals of SB 375 to reduce greenhouse gas emissions that are a bi-product of travel, especially drive-alone trips.

4

Since the adoption of the Mobility Plan 2035, the City continues to put the plan into action with meaningful results. In advancing the safety first goal, LADOT released the *Vision Zero Action Plan*<sup>1</sup> which aims to eliminate traffic-related deaths by 2025.

<sup>1</sup> [Vision Zero Action Plan](#), January 2017.

LADOT's Strategic Plan *Great Streets for Los Angeles*<sup>2</sup> released in January 2018 describes the department's vision to provide access to safe and affordable transportation choices that treat everyone with dignity and support vibrant inclusive communities. This Strategic Plan includes actionable strategies that advance the department's priorities through 2020.

Transportation technologies have changed rapidly within the past five years. LADOT released a transportation technology strategy titled, *Urban Mobility in a Digital Age*<sup>3</sup> in August 2016, which focuses on building a solid data foundation, leveraging technology and design for a better customer experience, creating partnerships for more complementary shared services and prepare for an automated future. In November 2019, LADOT released the Technology Action Plan that outlines the visions defined in the *Urban Mobility in a Digital Age*. This action plan provides guidance for LADOT to clearly communicate physical and virtual platforms that maximize equity and livability.

Lastly, Mayor Eric Garcetti released *LA's Green New Deal*<sup>4</sup> in April 2019, which sets aggressive goals for the City's sustainable future, tackles the climate emergency with accelerated targets to reduce greenhouse gas emissions, strengthens our economy and middle class, and sets the City on course to be carbon neutral by 2050.

We would like to underscore the strong commitments the City has made to advance innovative and sustainable transportation strategies that have the potential to transform the historical reliance on the personal automobile. In the creation of the Final Connect SoCal Plan, we invite SCAG to draw from the vast array of transformative strategies that can increase the share of sustainable trips, especially those that scale at the regional level.

4

#### Transportation System Project List

The RTP includes an extensive project list. As stated in the Project List appendix, the list is divided into three primary sections, as follows: 1) The Federal Transportation Improvement Program (FTIP), which forms the foundation of the RTP project investment strategy and represents the first six years of already committed funding; 2) the Financially Constrained list of projects not included in the FTIP but which have "reasonably available" funding; and 3) Strategic Plan projects representing an unconstrained list of potential projects that the region would pursue given additional funding and commitment.

LADOT closely reviewed the three Transportation Project lists. The City's requested revisions are categorized under the three RTP project list categories:

- *FTIP*: A small number of projects that were removed in a recent FTIP amendment remain on this draft list. This list should be updated to reflect the most recent FTIP amendment;
- *Financially-Constrained RTP*: SCAG should work with the City to ensure all eligible projects and programs are captured in the final list. There are some projects that have identified funding, under construction or being implemented that are omitted that should be included; and

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<sup>2</sup> [Great Streets for Los Angeles](#), January 2018.

<sup>3</sup> [Urban Mobility in a Digital Age](#), August 2016.

<sup>4</sup> [L.A.'s Green New Deal](#), April 2019.

- *Strategic Projects:* Some projects on this list were identified from adopted Community Plans and include projects related to decreasing automobile delay and improving the outdated Level of Service (LOS) metric. The City is re-evaluating whether these projects are compatible with the policy goals of SB 743. Several Community Plans are anticipated to be updated over the next few years and City staff may work with SCAG to ensure this projects on this list are compatible with current City policy goals.

Following the review of the Transportation Conformity Analysis Technical Report, Table 63 should reflect any changes made to the FTIP Project List included in the Project List Technical Report.

LADOT recently initiated the Mobility Investment Program (MIP), which represents the department's data-driven effort to capture and plan for mobility investments that advance the City's values and vision for transportation. The MIP institutes project-delivery best practices to identify funding opportunities early in project development, enhance project engagement and evaluation protocols, pursue formalized interagency collaboration, and establish short- and long-term capital improvement plans. As a comprehensive, map-based inventory of both funded and unfunded projects, LADOT will utilize the MIP to develop short-term (five year) and long-term (20 year) plans to serve as the Department's infrastructure playbook that will prioritize the City's mobility investments. In coordination with the RTP project lists, the MIP will be cross-referenced to ensure the projects within the City are included on the appropriate RTP project lists and reflect a similar level of priority and implementation timeframe identified by the City.

4

We suggest that the SCAG staff responsible for compiling the Transportation System Project List meet with LADOT Planning and Policy staff prior to adoption of the Final Connect SoCal Plan to ensure project information is up to date. Should the RTP Project Lists be updated to address any of the comments mentioned above, LADOT requests SCAG closely coordinate with City staff on the revisions.

#### SB 743 Implementation

In 2013, the State of California signed SB 743 into law, which requires a shift in the way cities measure environmental impacts. State guidelines require all cities to update their transportation impact analysis metrics from level of service (LOS) to vehicle miles traveled (VMT) before July 1, 2020. In July 2019, the City of Los Angeles adopted new CEQA Transportation thresholds, accompanied by updated Transportation Assessment Guidelines, to comply with SB 743.

The City acknowledges SCAG's efforts noted in the Connect SoCal plan to support and assist in the implementation of SB 743 throughout the region. One notable effort was the assistance provided through the Sustainability Planning Grants, of which several jurisdictions took advantage of including the City of Los Angeles. LADOT encourages SCAG to continue taking a leadership role in providing technical assistance to cities beyond the State's deadline to comply.

5

SCAG's in-house data and transportation modeling expertise could be leveraged to provide hands-on assistance to the jurisdictions within the SCAG region that may not have the staff resources or funding to appropriately respond to the State mandate. SCAG's leadership could narrow the gap in staff capacity and available funding by developing sub-regional sketch planning tools and recommending uniform

thresholds to be considered for each sub-area Council of Governments (COG). SCAG should continue to help develop VMT exchanges by providing more technical capacity and regional forums with a goal to better serve areas of the region with fewer mitigation options. Continued research on these topics will allow for more efficient implementation of SB 743 across jurisdictional lines in order to achieve the intended outcomes of the legislation: promote reductions in greenhouse gas emissions, develop multimodal transportation networks, and diversify land uses.

5

### Emerging Transportation Technology

Transportation technology has evolved rapidly over the last five years. Micro-mobility and on-demand transportation services, including Transportation Network Companies (TNCs) and dockless devices have dramatically changed how people travel within the City of Los Angeles and the SCAG region. The draft Connect SoCal plan's Emerging Technology Technical Report initiates a discussion on how these technologies impact travel behavior regionwide.

Connect SoCal alludes to the possibility of emerging technologies disrupting the transportation system and increasing VMT. We encourage SCAG to take a more proactive approach to integrating new transportation technologies in a way that promotes sustainable travel choices and meets the region's greenhouse gas emission reduction goals. LADOT's strategy for regulating, monitoring, and evaluating emerging transportation technologies is outlined in *Urban Mobility in a Digital Age*. The groundwork by which LADOT will implement this plan and regulate emerging technologies can be found in LADOT's Technology Action Plan (TAP).<sup>5</sup> LADOT recommends SCAG provide guidance in Connect SoCal to help cities throughout the region effectively manage new innovations operating in public spaces and neighborhoods.

6

Cities host a suite of operational and regulatory services that include moving people to safety during emergencies, sometimes shutting down streets, providing safe passage to those wishing to gather and demonstrate, and managing and pricing the curb to regulate parking and deliveries. New technology enabled modes require technological tools to enforce regulations, streamline customer service, and empower private companies to provide service equitably and responsibly. SCAG should consider both the needs and the opportunities of government agencies within their jurisdiction to leverage the technological advancement that brings both challenges and opportunities. In September 2019, LADOT deployed the Mobility Data Specification (MDS) to regulate dockless mobility. We urge SCAG to consider advancing the role of MDS and other digital regulatory tools to better plan for evolution in the transportation technology landscape.

Lastly, public transit use has declined over the past few years both throughout the SCAG region and nationwide. As the regional Metropolitan Planning Organization, SCAG plays a unique leadership role in policies and programs that support public transit use and sustainable transportation modes.

### Transportation Model Review

As SCAG updates and makes changes to the transportation model, LADOT urges SCAG to work closely with City staff to ensure those changes are consistent with existing datasets and forecasts. LADOT uses SCAG's transportation model as the foundation for the City's transportation model. Transparency in the

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<sup>5</sup> [Technology Action Plan](#), November 2019.

development of the model, baseline model assumptions, and framework are valued and critical components of the update process.

6

Conclusion

The draft Connect SoCal Plan and Program EIR provide a long-range vision that aims to balance future regional mobility and housing needs with economic, environmental, and public health goals. The plan represents a six-county effort to meet both State and Federal requirements and GHG reduction targets. If approved, the comments in this report will be submitted to SCAG by LADOT on behalf of the City of Los Angeles.

7

**FINANCIAL IMPACT**

This report contains comments regarding proposed policies and projects included in the draft Connect SoCal Plan (2020 RTP/SCS) and related Program EIR. The comments to be transmitted to SCAG will not impact the City's General Fund.

SJR:pl



# City of Mission Viejo

Office of the City Manager

Brian Goodell  
Mayor

Trish Kelley  
Mayor Pro Tem

Wendy Bucknum  
Council Member

Greg Raths  
Council Member

Edward Sachs  
Council Member

Electronic Transmittal:  
[ConnectSoCal@scag.ca.gov](mailto:ConnectSoCal@scag.ca.gov)  
[2020PEIR@scag.ca.gov](mailto:2020PEIR@scag.ca.gov)

January 22, 2020

Mr. Kome Ajise  
Executive Director  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, California 90017

Dear Mr. Ajise:

**Subject:** City of Mission Viejo Comments: Draft Connect SoCal and Draft Connect SoCal Program Environmental Impact Report

The City of Mission Viejo respectfully submits comments on the Southern California Association of Government (SCAG) draft 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and its associated Draft Program Environmental Impact Report (EIR), also known as Connect SoCal and the Connect SoCal Program EIR.

The comments provided below identify broader policy inquiries that surfaced as we reviewed the Connect SoCal documents. SCAG's responses to these inquiries will further assist in our understanding of the achievement of SB 375 greenhouse gas emissions reductions on the Connect SoCal Plan and its EIR alternatives, in addition to a clearer understanding of the application of Connect SoCal policies and EIR mitigation measures on local government projects.

1

The City of Mission Viejo comments are as follows:

**Greenhouse Gas Emissions Reductions:**

1) Connect SoCal Program EIR; Section 4; Alternatives:

**Discussion:** One of the primary objectives of Connect SoCal is to achieve SB 375 greenhouse gas emissions reduction targets for Year 2020 and Year 2035. The Connect SoCal Plan and the Program EIR identify that the Proposed Plan exactly meet the Year 2020 and Year 2035 GHG emissions reduction targets for cars and light-duty trucks of a per capita 8% and 19% reduction, respectively (PEIR: Table 3.8-10: SB 375 Analysis, page 3.8-74).

2

Mr. Kome Ajise

City of Mission Viejo Comments: Draft Connect SoCal & Draft Connect SoCal Program EIR

January 20, 2020

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The Draft Program EIR Alternatives section further outlines three alternatives for analysis: the No Project Alternative, Existing Plans-Local Input Alternative, and Intensified Land Use Alternative. As discussed below, the City of Mission Viejo recommends that the Program EIR be revised to include a quantification and consistent discussion on the amount of GHG emissions reduction that would be achieved for each EIR alternative.

This request is of particular importance, since Connect SoCal is based upon a land use distribution that differs from the Local Input received from SCAG jurisdictions. While the total numbers of population, households and employment are consistent at the jurisdiction level with the input provided by local jurisdictions on their future growth estimates, the proposed Connect SoCal plan internally shifts, within jurisdictions, future growth proximate to Priority Growth Areas such as high quality transit areas, resulting in a land use distribution that differs from the Local Input distribution, to reduce Vehicle Miles Traveled (VMT) and reduce greenhouse gas emissions.

2

Recommendations: Given that the distribution of land uses is different between the proposed Connect SoCal Plan, the Local Input Alternative, and the Intensified Land Use Alternative, the PEIR should clearly identify and consistently discuss in the narrative of each EIR Alternative, how much per capita GHG emissions reduction would be achieved for both Year 2020 and Year 2035, for all the EIR Alternatives, as follows:

- a) Table 4.0-1: Comparison of Connect SoCal and Alternatives (pages 4.0-7 –4.0-9) should be revised to include an “element” that addresses the amount of SB 375 GHG emissions reduction that would be achieved for Year 2020 and Year 2035 for the Connect SoCal Plan and each of the EIR Alternatives.
  - b) The narrative in the Alternatives section should be revised to consistently identify and reference how much GHG emissions reduction is achieved, for both Year 2020 and Year 2035, for each of the discussed Alternatives.
- 2) Connect SoCal Program EIR: Section 4: Alternatives: Alternative 3: Intensified Land Use Alternative:

Discussion: The Draft EIR discussion for the Intensified Land Alternative (pages 4.0-40 and 4.0-41) states that the transportation-related GHG emissions generated by this Alternative is projected to be less than the Connect SoCal Plan, because it generates less VMT. The Draft EIR further states that the Intensified Land Use Alternative is projected to achieve the 2020 target of 8% per capita reduction, and would exceed the 19% reduction for Year 2035 (actual amount is not specified; see Comment #1 above).

3

The draft EIR then proceeds to conclude that “Since meeting the regional reduction goals from cars and light-duty trucks would not be sufficient to meet the state’s overall GHG reduction goals, this alternative would conflict with AB 32 and SB 32. The Plan would have the same impact as this alternative.”



Recommendation: Please re-review the paragraph cited above. Its conclusion (that the Intensified Land Use Alternative and the Connect SoCal Plan GHG emissions reduction capabilities are not sufficient to meet the targets) seems contradictory and perhaps incorrect, based on the data cited.

3

**Vehicle Miles Traveled:**

3) Connect SoCal Program EIR: Section 3:8 Greenhouse Gases: SB 743 and VMT Guidance

Discussion: The Draft Program EIR includes detailed discussion on the statewide and regional emphasis to reduce VMT as a mechanism to tackle greenhouse gas emissions reductions goals established under AB 32, SB 32 and the California Air Resources Board’s Scoping Plan. However, the Draft EIR further states that “even if all MPOs meet their regional SB 375 GHG targets, the state would not be able to meet the statewide GHG reduction goals of AB 32, SB 32 and the Scoping Plan.” (page 3.8-80).

4

Recommendation: Please clarify if there is any discussion in the draft Connect SoCal Plan, the Draft SoCal EIR or any of the technical appendices of said documents, that either identifies, recommends, or infers the attainment of a specific VMT reduction policy, target or performance measure for the SCAG region, or that may be imposed upon local governments.

**Draft EIR Mitigation Measures:**

4) Draft Connect SoCal EIR Mitigation Measures: Table ES-5: Summary of Project Impacts, Mitigation Measures and Residual Impacts

Discussion: The Draft Program EIR discusses two tiers of mitigation measures: mitigation measures that would be applied to SCAG, and mitigation measures that would be applied to local jurisdictions and other lead agencies responsible for project-specific environmental review documents for specific projects. The project level mitigation measures are currently structured with a reference of “can and should”, as follows:

“In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project *can and should* consider mitigation measures to reduce substantial adverse effects .....”. (emphasis added).

5

Recommendation: The Draft EIR (page ES-16) states that the project level mitigation measure approach of “can and should” provides detail on possible mitigation measures that can be considered by Lead Agencies as they conduct environmental assessments of specific projects. The Draft EIR further recognizes that flexibility should be maintained in the application of mitigation approaches, given the variety and scope of projects proposed in the 6-county SCAG region. The Draft EIR further identifies narrative that the application of the “can and should” approach, “be considered by lead agencies in

Mr. Kome Ajise

City of Mission Viejo Comments: Draft Connect SoCal & Draft Connect SoCal Program EIR

January 20, 2020

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project-specific environmental review documents *as appropriate and feasible.*" (emphasis added).

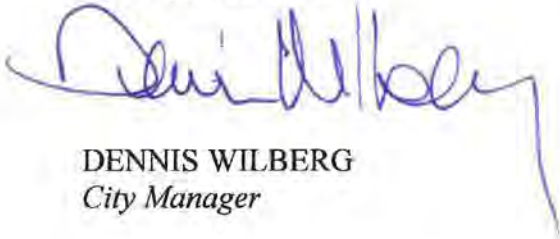
The City of Mission Viejo fully supports flexibility in the application of the project-level mitigation measures, and recommends that each of the project-level mitigation measures listed in the Draft Connect SoCal Program EIR be revised to also include the reference "as appropriate and feasible," as follows:

"In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should, as appropriate and feasible, consider mitigation measures to reduce substantial adverse effects .....".

The City of Mission Viejo appreciates the opportunity to provide comment on the broader policy issues raised herein, and also expresses support of the comments and recommendations on the Draft 2020 RTP/SCS and PEIR by the Orange County Council of Governments, the Orange County Transportation Authority, the Center for Demographic Research, and other Orange County agencies whose comments support Connect SoCal with its use of the Orange County's growth forecast – the 2018 Orange County Projections.

Should you have any questions on this transmittal, please do not hesitate to contact either Elaine Lister at [elister@cityofmissionviejo.org](mailto:elister@cityofmissionviejo.org), or Mark Chagnon at [mchagnon@cityofmissionviejo.org](mailto:mchagnon@cityofmissionviejo.org).

With appreciation,



DENNIS WILBERG  
City Manager

- c: City of Mission Viejo City Council  
Elaine Lister, Director of Community Development  
Mark Chagnon, Director of Public Works  
Larry Longenecker, Planning and Economic Development Manager  
Philip Nitollama, Traffic/Transportation Engineer  
Nate Farnsworth, OCCOG TAC Chair  
Marnie O'Brien Primmer, OCCOG Executive Director  
Gail Shiomoto-Lohr, GSL Associates

Claudia Manrique – City of Moreno Valley – Associate Planner

Connect SoCal Team:

The City of Moreno Valley appreciates the opportunity to submit comments on Southern California Association of Governments' (SCAG) Draft Connect SoCal Plan (also known as the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy or RTP/SCS). It is important that the Connect SoCal Plan is equitable, achievable, and results in sustainable development.

The City of Moreno Valley has reviewed the draft Connect SoCal Plan and related technical studies. Based on our review, the City of Moreno Valley has the following comments:

1. I-215 from I-10 to I-15 should be included as an existing major Goods Movement corridor.
2. SR60 through the Badlands to I-10 should be included as part of the Primary Highway Freight System.
3. Plan does not reflect current Riverside County Transportation Commission (RCTC) study / strategy for Metrolink and Express Bus expansion.
4. Arterial Network included is not complete for City of Moreno Valley.
5. The Planned Regional Express Lane Network should be updated to reflect recent Riverside County Transportation Commission (RCTC) decisions.
6. Active Transportation discussion should include the importance of consistent standards and maintenance for regional trail systems.
7. Bicycle Network is not complete for the City of Moreno Valley.
8. There is a need to compare the Draft Connect SoCal Plan with the proposed 6<sup>th</sup> Cycle RHNA for compatibility.



**CITY OF SOUTH PASADENA**

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January 21, 2020

Kome Ajise, Executive Director  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

**Re: City of South Pasadena Draft Connect SoCal Plan Comments**

Dear Mr. Ajise,

The City of South Pasadena (City) appreciates the opportunity to review and comment on the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) and associated Programmatic Environmental Impact Report (PEIR).

In October 2019, Governor Newsom signed Assembly Bill 29 (Holden) and Senate Bill 7 (Portantino) to remove the State Route 710 (SR-710) freeway stubs located north of Interstate 10 and south of Interstate 210 from the State Highway Code. In addition, AB 29 and SB 7 declared that “any other freeway or tunnel alternative to close the Interstate 710 North Gap shall no longer be deemed as feasible alternatives for consideration in any environmental review process for the Interstate 710 North Gap Closure project...”

Furthermore, the Los Angeles County Metropolitan Transportation Authority (Metro) and California Department of Transportation (Caltrans) decision to adopt the Transportation System Management/Transportation Demand Management Alternative for the SR-710 North Project further emphasizes the fact that the SR-710 Freeway Alternative is dead. The City is pleased to see that the description for Federal Transportation Improvement Program (FTIP) project LA710NB and RTP project 1M0101 has been updated to include the TSM/TDM Alternative in the RTP project list. The City recognizes that S1120082 was included in the Strategic Plan to reflect additional projects that have been proposed as SR-710 Mobility Improvement Projects.

However, the City is concerned by the inclusion of FTIP/RTP project 18790 (please refer to the below table). The project is described as an “Alternative Analysis, Engineering and Environmental Studies to close 710 freeway gap...” As described, this project is contrary to the Metro and Caltrans decision to move forward with the TSM/TDM Alternative and recent state legislation deeming any freeway alternative for the SR-710 North Project as infeasible.

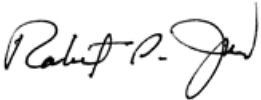
<u>FTIP ID</u>	<u>RTP ID</u>	<u>Description</u>	<u>Project Cost (\$1,000's)</u>
LA710NB	1M0101	SR RT. 710 North - Transportation System Management (TSM) & Transportation Demand Management (TDM) as identified in the EIR/EIS	\$111,000
18790	18790	Route 710: Study to perform Alternative Analysis, Engineering and Environmental Studies to close 710 freeway gap (EA# 18790, PPNO# 2215)	\$70,454
	S1120082	SR-710 Transportation Improvement Options	Strategic Plan

1

To ensure consistency with state legislation and the Metro and Caltrans decision to move forward with the TSM/TDM Alternative the City requests that project 18790 be removed from the RTP project list.

If you have any questions or comments, please feel free to contact Margaret Lin, Manager of Long Range Planning and Economic Development, at [mclin@southpasadenaca.gov](mailto:mclin@southpasadenaca.gov) or (626) 403-7236.

Sincerely,



Robert S. Joe  
South Pasadena Mayor

cc: South Pasadena City Council





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**OFFICE OF THE  
CITY MANAGER**

PAUL AREVALO  
CITY MANAGER

January 23, 2020

Roland Ok  
Senior Regional Planner  
Southern California Association of Governments  
900 Wilshire Blvd, Ste 1700  
Los Angeles, CA 90017

RE: Southern California Association of Governments Connect SoCal – Draft Program  
Environmental Impact Report (SCH# 2019011061)

Dear Mr. Ok:

Thank you for the opportunity to provide input on the Draft Connect SoCal Program EIR.

The City of West Hollywood is supportive of the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) vision to promote sustainable development in the region.

To that end, the City of West Hollywood encourages SCAG to actively support our ongoing work with Metro and the City of Los Angeles to accelerate delivery of the Northern Extension of the Crenshaw/LAX transit line through some of the densest and most congested parts of the region including Mid City Los Angeles, West Hollywood, and Hollywood. The Northern Extension project will transform regional mobility by forming a new north-south regional connector enabling tens of thousands of transit riders to avoid the need to travel downtown to transfer by linking five existing Metro Rail lines from the South Bay to the San Fernando Valley. This level of connectivity and access to opportunity will benefit several underserved communities; link countless major employment, entertainment, medical, and cultural centers; and generate ridership in excess of 90,000 daily riders—higher than any light rail line in the Country.

Because of these and other project benefits, the Northern Extension project will help the region achieve the RTP's stated goals of reducing greenhouse gas emissions and vehicle miles travelled while locating employment and density near transit.





CITY OF  
WEST HOLLYWOOD

In addition, the City of West Hollywood has revisions to the Draft Technical Report Project List:

- FTIP ID LAF9623 – This project is Phase I in a multiphase design district program including several other projects that should also be included. See enclosed Attachment 1 for a revised list of projects to be included in the final RTP/SCS.
- FTIP ID LA0G1052 – Remove this project as Metro has selected and is constructing an alignment along Wilshire Boulevard.
- Attachment 1 includes a revised list of additional projects to be included in the Final RTP/SCS to reflect our upcoming transportation investments.

If you have any questions, please contact Bob Cheung, Senior Transportation Planner, Long Range Planning Division at (323) 848-6346 or at [bcheung@weho.org](mailto:bcheung@weho.org).

Sincerely,

JOHN LEONARD  
Community and Legislative Affairs Manager  
City of West Hollywood

Enclosures:

Attachment 1: Revised List of Additional Projects to be Included in the Final RTP/SCS



City	Project Title	Project Description	Spot Project or Corridor Project	Extent 1	Extent 2	Additional Geographic Information	Funding Status	Budgeted Cost	Anticipated Completion Year
West Hollywood	Fountain Ave. Pedestrian Improvements	High visibility crosswalks, Enhancement of existing crosswalks, Landscaping and streetscaping, Crossing RRFB, lighting, left-turn prohibition, Signal timing adjustments (leading pedestrian intervals/protected left turn phases), Traffic calming (buffer striping and parking lane planters), Curb extensions	Corridor	Harper Ave.	Detroit St.	Key interventions at Harper Ave., Hayworth Ave., Formosa Ave, and Detroit St.	No dedicated funding	\$9,130,000	<5 years
West Hollywood	DD Streetscape Phase I	Melrose Complete street upgrades: bulbouts, crosswalk enhancements, sharrows, landscaping and tree canopy, street furniture, sidewalk upgrades, lighting upgrades, public wifi and fiber optic (Sharrows portion est. \$34,000)	Corridor	Vicente Blvd.	Croft Ave.		43% funded through a \$3.2 M Metro Grant	\$7,000,000	2021
West Hollywood	DD Streetscape Phase IV	Streetscapes - Melrose: San Vicente to Doheny, La Peer: SMB to Melrose, Almont: SMB to Melrose, & Robertson: Melrose to SMB (same treatments as Melrose Phase I) Beverly and Robertson South Complete street upgrades: Class II Bike Lane (Beverly, est. \$54,000), Sharrows (Robertson, est. \$17,000) bulbouts, crosswalk enhancements, landscaping and tree canopy, street furniture, sidewalk upgrades, lighting upgrades, public wifi and fiber optic	Corridor(s)	Vicente Blvd.	Doheny Dr.	Includes multiple streets	Some funding will be secured from 8899 Beverly and Robertson Lane public benefits	\$7,000,000	2023
West Hollywood	DD Streetscape Phase VI	Planning for 3 mobility hubs in the city	Corridor	Vicente Blvd.	Doheny Dr.	Includes two streets	14% funded with \$1 M from 8899 Beverly public benefit	\$6,000,000	2025
West Hollywood	Citywide Unsignalized Crosswalk In-roadway Warning Lights	Install in-roadway warning lights at all unsignalized crosswalks citywide and x new crosswalks. (15 total)	Spot(s)			Multiple sites citywide	No dedicated funding	\$750,000	
West Hollywood	Almont Dr: North/South Greenway	Greenway Three pedestrian crossing upgrades (unsignalized to RRFB): San Vicente Blvd & Library/PDC, San Vicente Blvd & Harratt St, La Cienega Blvd & Rosewood Ave. Six bicycle crossings: Holloway Dr & Palm Ave, Fairfax Ave & Willoughby Ave, Fountain Ave & Formosa Ave, La Cienega Blvd & Rosewood Ave	Corridor	Santa Monica Blvd.	Beverly Blvd.		No dedicated funding. Cost shown from BPMP, total cost for all Weho Greenways now anticipated to be \$2,019,600	\$440,000	>5 years
West Hollywood	Pedestrian and Bicycle Crossing Improvements		Spot(s)			Multiple sites citywide	No dedicated funding	\$423,000	
West Hollywood	Willoughby Ave: East/West Greenway	Greenway Gap closure between existing Class II bike lanes in Beverly Hills and West Hollywood by cutting back the median island on one side and relocating drainage, ramps, new high visibility green	Corridor	La Cienega Ave.	La Brea Ave.	60% LA 40% Weho	No dedicated funding. Cost shown from BPMP, total cost for all Weho Greenways now anticipated to be \$2,019,601	\$370,000	<5 years
West Hollywood	Santa Monica Blvd. Bike Lane paint, etc.		Spot	Almont Dr.	Doheny Dr.	Closes only remaining gap from West LA to Kings Rd	No dedicated funding	\$250,000	2020
West Hollywood	Transit Screens	Install screens that display transit information at 2 outdoor locations and 5 indoor locations.	Spot(s)			Multiple sites citywide	No dedicated funding	\$220,500	
West Hollywood	Gardner Street/Vista Street Neighborhood Greenway	Greenway	Corridor	Fountain Ave.	Willoughby Ave.		No dedicated funding. Cost shown from BPMP, total cost for all Weho Greenways now anticipated to be \$2,019,602	\$150,000	>5 years
West Hollywood	Westbourne Dr. Bike - friendly traffic diverters	Bike -friendly traffic diverters (2: North of Santa Monica and Beverly Blvd.)	Corridor	Santa Monica Blvd.	Beverly Blvd.		No dedicated funding	\$50,000	<5 years
West Hollywood	Holloway Dr. Bike Lane	Install Class II Bike Lane	Corridor	Sunset Blvd.	Monica Blvd.		No dedicated funding	\$45,000	>5 years
West Hollywood	Romaine St. Sharrows	Install Class III Bikeway (Sharrows)	Corridor			City Limits	No dedicated funding	\$34,000	<5 years
West Hollywood	Crescent Heights Blvd. Uphill Bike Lane	Install Uphill Class II bike lane/downhill Class III bikeway (sharrows)	Corridor	Santa Monica Blvd.	Sunset Blvd.		No dedicated funding	\$31,000	>5 years
West Hollywood	Bicycle Parking	Installing additional racks (20) and lockers (10) citywide	Spot(s)			Multiple sites citywide	No dedicated funding	\$25,600	
West Hollywood	San Vicente Blvd. Uphill Bike Lane	Install Uphill Class II bike lane/downhill Class III bikeway (sharrows)	Corridor	Santa Monica Blvd.	Sunset Blvd.		No dedicated funding	\$25,420	>5 years
West Hollywood	Bike Friendly Traffic Diverters	Bike -friendly traffic diverter (1 between Sunset Blvd. and Holloway Dr.)	Corridor	Sunset Blvd.	Holloway Dr.		No dedicated funding	\$25,000	<5 years
West Hollywood	Hilldale Ave. Bike -friendly traffic diverter	Bike -friendly traffic diverter (1 just south of Sunset Blvd.)	Corridor	Sunset Blvd.			No dedicated funding	\$25,000	<5 years
West Hollywood	Huntley Dr. Bike -friendly traffic diverter	Bike -friendly traffic diverter (1 at Beverly Blvd.)	Corridor	Beverly Blvd.			No dedicated funding	\$25,000	<5 years
West Hollywood	Olive Dr. Bike -friendly traffic diverter	Bike -friendly traffic diverter (1 between Sunset Blvd. and Fountain Ave.)	Corridor	Sunset Blvd.	Fountain Ave.		No dedicated funding	\$25,000	<5 years
West Hollywood	Doheny Dr. Sharrows	Install Class III Bikeway (Sharrows)	Corridor	Cynthia St.	Monica Blvd.	Coordiante With LA and Beverly Hills	No dedicated funding	\$23,800	>5 years
West Hollywood	Cynthia St. Bike Lane	Install Class II Bike Lane	Corridor	Doheny Dr.	Vicente Blvd.		No dedicated funding	\$22,500	>5 years
West Hollywood	Doheny Dr. Uphill Bike Lane	Install Uphill Class II bike lane/downhill Class III bikeway (sharrows)	Corridor	Cynthia St.	Sunset Blvd.		No dedicated funding	\$13,640	>5 years
West Hollywood	Bicycle Repair Facilities	Bicycle repair facilities at 5 locations	Spot(s)			Multiple sites citywide	No dedicated funding	\$10,000	
West Hollywood	Crescent Heights Blvd. Sharrows	Install Class III Bikeway (Sharrows)	Corridor	Santa Monica Blvd.	Romaine St.		No dedicated funding	\$8,500	>5 years
West Hollywood	Santa Monica Blvd. Bike Lane High Visibility Markings	Install High Visibility Markings and Conflict Striping from Doheny to Kings	Corridors	Doheny Dr.	Kings Rd.		No dedicated funding		<5 years
West Hollywood	Fairfax Ave. Bike Line High Visibility Markings	Install High Visibility Markings and Conflict Striping	Corridors				No dedicated funding		
West Hollywood	San Vicente Blvd. Bike Lane High Visibility Markings	Install High Visibility Markings and Conflict Striping	Corridors				No dedicated funding		
West Hollywood	Gardner St./Vista St. Bike Lane	Install Class II Bike Lane	Corridor	Fountain Ave.	Willoughby Ave.	Will also include Greenway elements	No dedicated funding		<5 years

City	Project Title	Project Description	Spot Project or Corridor Project	Extent 1	Extent 2	Additional Geographic Information	Funding Status	Anticipated	
								Budgeted Cost	Completion Year
West Hollywood	CNE Local Match	Local match for First/Last Mile improvements associated with new rail stations: minimum 3% match for Metro's Crenshaw line extension through West Hollywood. First/Last mile improvements are primarily pedestrian and bicycle amenities.	Spot(s)			Multiple sites citywide	No dedicated funding	\$66,000,000	
West Hollywood	Transit Expansion Smart Parking Meters (real time pricing)	Expand the PickUp Line, CityLine Commuter and CityLine Local services through procurement of additional vehicles. Implement an on-street intelligent parking program that includes dynamic demand-based pricing.	Corridors(s)			Citywide	No dedicated funding	\$17,009,485	
West Hollywood	On-demand transit pilot project (microtransit)	Plan and implement a one-year pilot program including procurement of vehicle and associated technology resources, and evaluation of pilot.					No dedicated funding	\$6,790,000	
West Hollywood	Smart Streetlights	Upgrade traditional street lights by deploying new, energy-efficient street lights with sensors that collect data to measure curbside activity (parking), pedestrian and bicycle activity, and vehicle activity	Corridors(s)			Multiple sites citywide	No dedicated funding	\$4,300,000	
West Hollywood	Comprehensive right-of-way & curbside management pilot program	Implement a curbside management pilot program to manage the curbside right-of-way. Melrose Gathering Space: convert excess travel lane and angled parking to pocket park, street amenities, and public art	Corridors(s)			Citywide	No dedicated funding	\$2,100,000	
West Hollywood	DD Streetscape Phase II	Beverly Gathering Space: convert City parking lot to pocket park, street amenities, and public art	Spot	Norwich Ave.	Huntley Dr.	May be extended 1 block	No dedicated funding	\$1,874,400	2021
West Hollywood	DD Streetscape Phase VII	Signal timing upgrades (N/S coordination, real time dynamic TMC)	Spot	Robertson Blvd.	Bonner Dr.		100% funded with \$1 M from 8899 Beverly public benefit	\$1,000,000	2025
West Hollywood	EV Infrastructure & Charging V2X Connected Vehicle Infrastructure	Construction of 8 on-street EV charging stations.	Spot(s)			Multiple sites citywide	No dedicated funding	\$660,000	
West Hollywood	City Bus Services Electrification	Install Bluetooth technology at 25 intersections in the city as connected vehicle infrastructure. Upgrade City transit services (CityLine, CityLine X, Weho Pick Up, Sunset Trip) to electric vehicles and install necessary charging infrastructure.	Spot(s)			Multiple sites citywide	No dedicated funding	\$542,200	
West Hollywood						Multiple sites citywide	No dedicated funding	\$267,150	2030



# CITY OF YORBA LINDA

4845 CASA LOMA AVENUE • YORBA LINDA • CALIFORNIA 92686

January 21, 2020

Kome Ajise  
Executive Director  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, California 90017

**Subject: Comments on Draft Connect SoCal Plan and PEIR**

Dear Mr. Ajise:

The City of Yorba Linda appreciates the opportunity to review and provide feedback on the draft Connect SoCal Plan and its accompanying Program Environmental Impact Report (PEIR). We especially appreciate the opportunity SCAG provided through the Bottom-Up Local Input and Envisioning Process during 2017-2018. We recognize the significant amount of time, effort, and coordination it takes to put together a plan of this magnitude. Our primary concern with the Connect SoCal Plan is its inconsistency with the draft Regional Housing Needs Assessment (RHNA).

Specifically, the City offers the following public comments on Connect SoCal and its PEIR. We recognize that some of our comments are directly related to the draft RHNA methodology; however, we believe that these comments are relevant to Connect SoCal since SB 375 requires that SCAG "identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584." We also recognize that although neither Connect SoCal nor the RHNA have been adopted, as proposed these two plans will be inconsistent with one another. This is significant because Government Code 65584.04(m) requires that RHNA "allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy."

- 1) The growth and need forecasted in RHNA is dramatically inconsistent with the draft Connect SoCal growth forecast. Section 3.14.1.1 of the draft PEIR defines *household* as "all the people who occupy a housing unit." This definition includes related and unrelated persons sharing a housing unit, including individuals living in overcrowded conditions. Table 14 of the Demographics and Growth Forecast Technical Report identifies a projected household growth for the City of Yorba Linda of 900 households between 2016 and 2045 (or 31 households per year). However, the draft RHNA projects the need for an additional 2,322 housing units between 2021 and 2029 (290 housing units per year). If RHNA is supposed to be consistent with the development pattern of Connect SoCal and SCAG only

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projects an additional approximately 250 households (31 units x 8 years) over the eight-year RHNA period for the City of Yorba Linda, why would RHNA project the need for 2,322 housing units over the same eight-year period? Even if it is assumed that all 900 projected households from Connect SoCal would happen by 2029, why would RHNA project the need for 2,322 housing units?

Furthermore, according to the 2019 Department of Finance Population and Housing Estimates, the City of Yorba Linda has 861 vacant housing units (3.6% vacancy rate). The City could easily accommodate the projected household growth of 250 households over the eight-year RHNA period through its existing vacant housing units and still have over 600 vacant housing units available without constructing any additional housing units. In other words, the proposed RHNA would essentially require the City to construct an additional 2,322 housing units plus utilize its 861 vacant housing units (a total of 3,183 housing units) to accommodate a projected population growth of 1,644 people and a projected household growth of 250 for the eight-year RHNA period. This is in direct conflict with Government Code Section 65080(b)(2)(B) and Government Code Section 65584.04(m) that require that Connect SoCal and RHNA be consistent with one another. Ironically, it is actually the SCAG staff recommended RHNA methodology from November 7, 2019, that much more closely aligns with the growth forecast and development pattern found within the Connect SoCal Plan.

- 2) It is also important to point out that Section 3.14.1.2 (Existing Population, Housing, and Employment) of the draft PEIR identifies four guiding principles that were not properly updated to reflect the latest draft from the October 17, 2019 Technical Working Group (TWG). The first principle should state, "The preferred scenario will be adopted at the jurisdictional level, and directly reflects the population, household and employment growth projections that have been reviewed and refined with feedback from local jurisdictions through SCAG's Bottom-Up Local Input and Envisioning Process. The preferred scenario maintains these locally informed projected jurisdictional growth totals, meaning future growth is not reallocated from one local jurisdiction."

The draft RHNA differs from the Connect SoCal growth forecast. As proposed, the projected household growth from Connect SoCal will be redistributed from one jurisdiction to another through the RHNA methodology, which conflicts with SCAG's guiding principle of not reallocating growth from one jurisdiction to another.

- 3) Sections 3.11.2.2 and 3.14.2.2 of the PEIR are incorrect in the explanation of RHNA. Pages 3.11-33 and 3.14-14 both state, "***The RHNA does not necessarily encourage or promote growth***, but rather allows communities to anticipate growth and address existing need, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment." Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and

counties should undertake all necessary actions to **encourage, promote, and facilitate the development of housing** to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the five objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).

- 4) Pages 3.11-33 and 34 and page 3.11-15 of the PEIR state, “Per SB 375, the **projected need’s portion** of the 6<sup>th</sup> Cycle RHNA will be consistent with the Connect SoCal for the comparable period.” SB 375 requires that the RHNA, which includes both existing and projected housing need, be consistent with the Connect SoCal for the comparable period (see Government Code Section 65584.04(m)). RHNA should “allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy.” Please revise the explanation to state that the RHNA (including existing and projected need) will be consistent with the Connect SoCal.
- 5) Page 3.14-16 of the draft PEIR states, “The SCS must accommodate the **projected need portion** of the 6<sup>th</sup> Cycle RHNA.” This statement is misleading in that Government Code 65080 states that the SCS must “identify areas within the region sufficient to house an eight-year projection of the regional housing need [existing **and** projected need] for the region.” The PEIR also states, “While the existing housing need portion of the 6<sup>th</sup> cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.” While the development pattern for the projected need portion of the RHNA (approximately 505,000 housing units) is clearly outlined in the PEIR and Connect SoCal Plan, the development pattern for the remaining approximately 835,000 housing units for “existing need” (approximately 62% of the total housing need) is not addressed in any specificity in the PEIR. For the City of Yorba Linda, it is completely unreasonable to assume that 2,322 new housing units are necessary to accommodate approximately 250 households through the upcoming RHNA cycle, or even to accommodate 900 households through 2045.
- 6) If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, the RHNA methodology is a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing. The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations. Therefore, wouldn’t the draft RHNA methodology need to be evaluated as a reasonable alternative within the PEIR?

Draft Connect SoCal Plan and PEIR Comment Letter  
January 21, 2020

- 7) Exhibit 1 of the Sustainable Communities Strategy Technical Report is described as "the growth vision and the forecasted regional development pattern." This exhibit is confusing and needs a better explanation. For example, do darker shades of blue represent higher priority growth areas?
- 8) Page 48 of the draft Connect SoCal Plan describes "absolute constraint areas" but the term is not defined within the glossary. Please include a definition for this term.
- 9) Several exhibits throughout the Plan and Technical Reports show the I-5 corridor between Anaheim and Mission Viejo as a High Quality Transit Area (HQTA); however, that corridor does not currently have any HQTA. Furthermore, the proposed Bus Rapid Transit (BRT) has not even had specific stop locations identified or evaluated by Orange County Transportation Authority (OCTA). Therefore, referring to the entire corridor as a HQTA is not appropriate. Please remove this from all exhibits.
- 10) The City also supports the comments made by the Orange County Council of Governments and Cal State Fullerton's Center for Demographic Research.

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The City recognizes and appreciates the time and effort provided by everyone on this important and complex issue and for your consideration of these items. As far as we understand, this will be considered by the Regional Council on March 5, 2020. We also understand that at this same meeting the Regional Council will be discussing the RHNA methodology and RHNA appeals procedures. It is absolutely imperative that there is sufficient time for the Regional Council to discuss any questions or concerns with the Plan and its PEIR as well as the RHNA methodology and appeals. In order to avoid another rushed meeting agenda where Regional Council members are denied the opportunity to ask questions and provide comment, we strongly encourage SCAG to either reschedule the RHNA discussion to another date or extend the length of the meeting. Please let me know if you need any additional clarification or have any questions by contacting me at (714) 961-7130 or [dbrantley@yorbalingca.gov](mailto:dbrantley@yorbalingca.gov).

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Sincerely,



David Brantley  
Community Development Director

cc: Mark Pulone, City Manager  
Nate Farnsworth, Principal Planner  
Deborah Diep, Center for Demographic Research

**Coalition For A Safe Environment  
California Kids IAQ  
Community Dreams  
EMERGE  
American Legion Post # 6  
Wilmington Improvement Network  
San Pedro & Peninsula Homeowners Coalition  
NAACP- San Pedro-Wilmington Branch # 1069  
St. Philomena Social Justice Ministry**

January 24, 2020

Southern California Association of Governments (SCAG)  
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2020PEIR@scag.ca.gov

Su: Draft Connect SoCal PEIR  
Re: Public Comments

The Coalition For A Safe Environment et al co-signature organizations respectfully submit these Public Comments on behalf of our members, organization affiliations and the public regarding the Draft Connect SoCal PEIR.

When reviewing the Draft Connect SoCal PEIR we discovered that the document was 3,005 pages in length. We also discovered that it was impossible to read, assess, discuss, seek expert opinion and comment on this 3,005 page document in 45 days.

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We respectfully request a 30 extension for the public comment period. We will advise our elected officials of this request for an extension.

We did note that throughout the document there was a failure to identify, acknowledge and address the unique and disproportional impacts to Environmental Justice Communities and Disadvantaged Communities. As you are aware, there are now numerous Federal, State, Regional, County and City laws, executive orders, public policies, rules, regulations, ordinances and programs that address the subject of Environmental Justice Communities and Disadvantaged Communities that have legal mandates to comply.

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We request that a new section be added to the Draft PEIR that addresses the subject of Environmental Justice and Disadvantaged Communities.

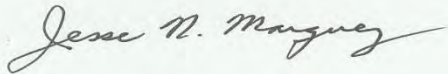
Our public comment consists of a red mark-up of the original document with our requested changes, additional information and noted areas of required information. We have attached our public comments by Draft Connect SoCal PEIR Chapters to this public comment letter.

- 3.3 AIR QUALITY
- 3.11 LAND USE AND PLANNING

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For additional information, Jesse N. Marquez is our principal contact person for these submitted public comments.

Respectfully Submitted,



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### 3.3 AIR QUALITY

This section of the Program Environmental Impact Report (PEIR) describes air quality within the SCAG region, identifies the regulatory framework with respect to laws and regulations that affect air quality, and analyzes the potential impacts of the Connect SoCal Plan (“Connect SoCal”; “Plan”).

The U.S. EPA, California Air Resources Board and the South Coast Air Quality Management District describe air quality, environmental impacts and public health impacts from air quality based on three major categories of emissions:

- Criteria Air Pollutants
- Toxic Air Pollutants aka Hazardous Air Pollutants aka Toxic Air Contaminants
- Green House Gases

(Note: OEHHA is a health agency that uses the term Toxic Air Contaminants)

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In addition, this PEIR provides regional-scale mitigation measures as well as project-level mitigation measures to be considered by lead agencies for subsequent, site-specific environmental review to reduce identified impacts as appropriate and feasible.

#### 3.3.1 DEFINITIONS

**Air Dispersion:** Air dispersion is defined as how air pollutants travel through ambient air. Toxic Air Contaminants/Mobile Source Air Toxics (TACs/MSATs) impact those located closest to the emission sources more than those located further away. A California law passed in 2003 (Public Resources Code Section 21151.8) prohibits the siting of a school within 500 feet of a freeway unless “the school district determines, through analysis based on appropriate air dispersion modeling, that the air quality at the proposed site is such that neither short-term nor long-term exposure poses significant health risks to pupils.” The U.S. EPA has issued a number of regulations that will dramatically decrease MSATs through cleaner fuels and cleaner engines.

**Concentrations:** The amount of pollutant material per volumetric unit of air, measured in parts per million (ppm) or micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ). The following discussion identifies the pollutants included in this analysis.

**Criteria Air Pollutants:** Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards for outdoor concentrations. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort.

exhaust, which includes DPM is  $5 \mu\text{g}/\text{m}^3$ . This value is similar to the National Ambient Air Quality Standard established for fine particulate matter, which is  $15 \mu\text{g}/\text{m}^3$ .<sup>17</sup>

### Cumulative Impacts

**Emissions:** The quantity of pollutants released into the air, measured in pounds per day (ppd) or tons per day (tpd).

GHG Greenhouse Gases – Components of the atmosphere that contribute to the greenhouse effect. The principal greenhouse gases that enter the atmosphere because of human activities are carbon dioxide, methane, nitrous oxide, and fluorinated gases.

### Toxic Air Pollutants

**Visibility:** With the exception of Lake County, which is designated in attainment, all of the air districts in California are currently designated as unclassified with respect to the California Ambient Air Quality Standards (CAAQS) for visibility reducing particles. (A pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.)

Since deterioration of visibility is one of the most obvious manifestations of air pollution and plays a major role in the public's perception of air quality, the state of California has adopted a standard for visibility or visual range. Until 1989, the standard was based on visibility estimates made by human observers. The standard was changed to require measurement of visual range using instruments that measure light scattering and absorption by suspended particles. The visibility standard is based on the distance that atmospheric conditions allow a person to see at a given time and location. Visibility reduction from air pollution is often due to the presence of sulfur and nitrogen oxides, as well as particulate matter. Visibility degradation occurs when visibility reducing particles are produced in sufficient amounts such that the extinction coefficient is greater than 0.23 inverse kilometers (to reduce the visual range to less than 10 miles) at relative humidity less than 70 percent, 8-hour average (from 10:00 a.m. to 6:00 p.m.) according to the state standard.

## 3.3.2 ENVIRONMENTAL SETTING

The SCAG region encompasses a population exceeding 19 million persons in an area of more than 38,000 square miles within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura.

Air quality in the four air basins in the SCAG region—South Coast Air Basin (SCAB), Mojave Desert Air Basin (MDAB), Salton Sea Air Basin (SSAB), and South Central Coast Air Basin (SCCAB) (Ventura

commercial areas. The MATES V study proposes to study air toxics for a one-year period at ten fixed sites beginning in January 2019.<sup>73</sup>

You referenced the average cancer risk stated in the MATES IV Study but failed to reference Environmental Justice Communities whose cancer risk is 2x and 3x greater than the average and have not declined. We want to see a Table of the Highest Cancer Risk EJ Communities in the SCAB region. The SCAQMD intentionally manipulated the MATES V Study (a fact that is verifiable) and did not include Wilmington one of the highest Cancer Risk EJ Communities so as not to skew the data to the worse.

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AB 32 Global Warming Solutions Act of 2006 - AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020 - a reduction of approximately 15 percent below emissions expected under a “business as usual” scenario. Pursuant to AB 32, ARB must adopt regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. The full implementation of AB 32 will help mitigate risks associated with climate change, while improving energy efficiency, expanding the use of renewable energy resources, cleaner transportation, and reducing waste. Reductions in GHG emissions will come from virtually all sectors of the economy and will be accomplished from a combination of policies, planning, direct regulations, market approaches, incentives and voluntary efforts. These efforts target GHG emission reductions from cars and trucks, electricity production, fuels, and other sources

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This Draft PEIR is in non-compliance with AB 32 because SCAG rubber-stamps and approves all projects and it does not require transportation and infrastructure projects to comply.

AB 617 Nonvehicular air pollution: criteria air pollutants and toxic air contaminants - This bill would require the state board, by October 1, 2018, to prepare and update, at least once every 5 years, a statewide strategy to reduce emissions of toxic air contaminants and criteria pollutants in communities affected by a high cumulative exposure burden. The bill would require the state board to select locations around the state for the preparation of community emissions reduction programs, and to provide grants to community-based organizations for technical assistance and to support community participation in the programs. The bill would require an air district containing a selected location, within one year of the state board’s selection, to adopt a community emissions reduction program. By increasing the duties of air districts, this bill would impose a state-mandated local program. This bill would require a district that is in nonattainment for one or more air pollutants to adopt an expedited schedule for the implementation of best available retrofit control technology, as specified. The bill would require the schedule to apply to each industrial source that, as of January 1, 2017, was subject to a specified market-based compliance mechanism and give highest priority to those permitted units that have not modified emissions-related permit conditions for the greatest period of time. The bill would require an air district containing a selected location, within one year of the state board’s selection, to adopt a community emissions reduction program. By increasing the duties of air districts, this bill would impose a state-mandated local program.

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This Draft PEIR is in non-compliance with AB 617 because SCAG rubber-stamps and approves all projects and it does not require transportation and infrastructure projects to comply. The Draft PEIR does not require community emission reductions from stationary and mobile sources in projects. 10 AB 617 Pilot Project Communities have already completed and submitted their Community Emissions Reduction Plans in conjunction with their local AQMD.

SB 44 requires CARB to create a comprehensive plan for reducing greenhouse gas emissions from medium- and heavy-duty vehicles.

SB 210 – The bill requires the California Air Resources Board (CARB) to develop and implement a Heavy-Duty Inspection and Maintenance Program for non-gasoline, heavy-duty trucks—the first ‘smog check’ program of its kind in the nation. The bill would remove levels of oxides, nitrogen and particulate matter from the air equivalent to removing 375,000 trucks from California roads by 2031. A “smog check” for trucks would also help prevent thousands of cases of asthma and respiratory diseases that disproportionately impact economically disadvantaged neighborhoods near major highways and freight hubs.

SB 375 Sustainable Communities and Climate Protection Act of 2008 - The bill requires the regional transportation plan for regions of the state with a metropolitan planning organization to adopt a sustainable communities strategy, as part of its regional transportation plan, as specified, designed to achieve certain goals for the reduction of greenhouse gas emissions from automobiles and light trucks in a region. The Bill focuses on incentivizing regional and local planning and building in ways that bring people and destinations closer together, with low-carbon, alternative and convenient ways to get around. It requires regional metropolitan planning organizations in California to develop Sustainable Communities Strategies (SCS), or long-range plans, which align transportation, housing, and land use decisions toward achieving GHG emissions reduction targets set by the California Air Resources Board (CARB).

This Draft PEIR is in non-compliance with AB 375 because SCAG rubber-stamps and approves all projects and it does not require transportation, infrastructure, housing and land use projects to comply.

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### ***Senate Bill 656 (Chapter 738, Statutes of 2003)***

In 2003, the Legislature enacted Senate Bill (SB) 656 (Chapter 738, Statutes of 2003), codified as Health and Safety Code Section 39614, to reduce public exposure to PM10 and PM2.5. SB 656 required ARB, in consultation with local air pollution control and air quality management districts (air districts), to develop and adopt, by January 1, 2005, a list of the most readily available, feasible, and cost-effective control measures that could be employed by ARB and the air districts to reduce PM10 and PM2.5 (collectively referred to as PM).<sup>74</sup>

The legislation established a process for achieving near-term reductions in PM throughout California ahead of federally required deadlines for PM2.5, and provided new direction on PM reductions in those areas not subject to federal requirements for PM. Measures adopted as part of SB 656 complement and support those required for federal PM2.5 attainment plans, as well as for State ozone plans. This ensures continuing focus on PM reduction and progress towards attaining California’s more health protective standards. This list of air district control measures was adopted by the ARB on November 18, 2004. ARB also developed a list of State PM control measures for mobile and stationary sources, including measures planned for adoption as part of ARB’s Diesel Risk Reduction Plan. The lists are at the following web site: <http://www.arb.ca.gov/pm/pmmeasures/pmmeasures.htm>.

### ***California Air Resources Board Mobile Source Programs***

#### **Emission Reduction Plan for Ports and Goods Movement**

Our County - Los Angeles Countywide Sustainability Plan - OurCounty is organized around 12 cross-cutting goals that describe our shared vision for a sustainable Los Angeles County.

**Goal 1: Resilient and healthy community environments where residents thrive in place** The County will protect low-income communities and communities of color from pollution, reduce health and economic inequities, and support more resilient and inclusive communities.

**Goal 2: Buildings and infrastructure that support human health and resilience** The buildings and infrastructure of both yesterday and tomorrow will utilize more efficient technologies and practices that reduce resource use, improve health, and increase resilience.

**Goal 3: Equitable and sustainable land use and development without displacement** With policy tools such as anti-displacement measures, existing community members can remain in and strengthen their neighborhoods and networks while accepting new residents through more compact, mixed-use development.

**Goal 4: A prosperous LA County that provides opportunities for all residents and businesses and supports the transition to a green economy** We will support the growth of green economy sectors through our procurement practices, land use authority, and various economic and workforce development incentives.

**Goal 5: Thriving ecosystems, habitats, and biodiversity** The region's ecosystems, habitats, and biodiversity are under stress from urbanization and climate change. Careful planning will ensure that our ecosystems, including urban habitats, thrive even as our region becomes increasingly urbanized.

**Goal 6: Accessible parks, beaches, recreational waters, public lands, and public spaces that create opportunities for respite, recreation, ecological discovery, and cultural activities** The County will help make parks and public lands more accessible and inclusive and will manage them carefully so that all residents may enjoy their benefits.

**Goal 7: A fossil fuel-free LA County** By supporting an efficient transition to a zero emission energy and transportation system, the County will be a leader in taking action to address the climate crisis. **EXAMPLE TARGET: BY 2050, ACHIEVE CARBON NEUTRALITY**

**Goal 8: A convenient, safe, clean, and affordable transportation system that enhances mobility while reducing car dependency** By developing programs that focus on reducing the number of miles people travel in private vehicles, the County will help people choose alternatives to single-occupancy vehicles. These programs will expand residents' mobility, including those residents whose limited automobile access translates to stifled economic opportunity.

**Goal 9: Sustainable production and consumption of resources** The County will effectively manage our waste, water, energy, and material resources by improving our ability to promote integrative and collaborative solutions at the local and regional scale.

**Goal 10: A sustainable and just food system that enhances access to affordable, local, and healthy food** The County of Los Angeles will leverage its capital assets, public services, and regulatory authority to improve access to healthy food within County boundaries while optimizing its purchasing power and business services to make food production more sustainable.

**Goal 11: Inclusive, transparent, and accountable governance that facilitates participation in sustainability efforts, especially by disempowered communities** The County will act to create a more inclusive and accountable governance structure, in order to build stronger communities and better-informed policy and programs.

**Goal 12: A commitment to realize OurCounty sustainability goals through creative, equitable, and coordinated funding and partnerships** The County will seek to strengthen partnerships, establish new funding techniques, and leverage its own purchasing power to advance the goals of OurCounty.

This Draft PEIR is in non-compliance with Our County - Los Angeles Countywide Sustainability Plan because SCAG rubber-stamps and approves all projects and it does not require compliance to the 12 Goals.

### 3.3.4 ENVIRONMENTAL IMPACTS

in order to estimate emissions from mobile sources and includes County-specific data, such as fleet mix in order to estimate criteria air pollutants. See **Appendix 3.3, Health Risk Assessment Technical Report**, for more detail.

In *California Building Industry Association (CBIA) vs. Bay Area Air Quality Management District (BAAQMD)*, the California Supreme Court ruled that agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents unless the proposed project risks exacerbating those environmental hazards or conditions that already exist.<sup>122</sup>

Therefore, emissions from the existing transportation network, including freeways, are generally not considered impacts under CEQA unless the project exacerbates the existing environmental conditions.<sup>123</sup> Since Connect SoCal includes transportation projects, including freeway improvements, that could occur within 500 feet of sensitive receptors (thereby exacerbating an existing condition), this section analyses the risk posed from existing freeways on sensitive receptors.

The mitigation measures in the PEIR are divided into two categories: SCAG mitigation and project-level mitigation measures. SCAG mitigation measures shall be implemented by SCAG over the lifetime of the Plan. For projects proposing to streamline environmental review pursuant to SB 375, SB 743, or SB 226 (as described in **Chapter 1.0, Introduction**), or for projects otherwise tiering off this PEIR, the project-level mitigation measures described below (or comparable measures) can and should be considered and implemented by Lead Agencies and Project Sponsors during the subsequent, project- or site-specific environmental reviews for transportation and development projects as applicable and feasible. However, SCAG cannot require implementing agencies to adopt mitigation, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation.

However, SCAG can:

- Review and submit written public comments on projects.
- Identify areas of non-compliance with CEQA requirements.
- Not include projects on its state and federal funding list.
- Recommend mitigation measures.
- File motions to intervene on projects not in compliance with CEQA, RTP and the public interests.

(Example: The Port of Los Angeles BNSF Southern California Gateway Intermodal Project EIR that was approved by the Port of Los Angeles Board of Harbor Commissioners and the City of Los Angeles did not comply with CEQA and five class action lawsuits were filed with the State Attorney General filing a Motion to Intervene on behalf of the Plaintiffs. The City of Long Beach, Long Beach Unified School District and the South Coast AQMD were co-plaintiffs with non-profit environmental justice organizations and public interest groups. The Port and City of LA were found guilty and the project stopped.)

Connect SoCal would result in a less than significant impact to air quality related to the potential to conflict with or obstruct implementation of the adopted SIPs/AQMPs/Attainment Plans in the SCAG region because the projected long-term emissions are in alignment with the local SIPs/AQMPs as demonstrated in the transportation conformity analysis, found in the Conformity Technical Report for the Plan.<sup>124</sup> The emissions resulting from the Plan are within the applicable emissions budgets as stated in the SIPs/AQMPs for each nonattainment or maintenance area for all milestone, attainment, and planning horizon years.

*Significant Impact.*

The Connect SoCal PIER will result in significant impact to air quality because SCAG automatically and programmatically approves all projects and lists projects for state and federal funding that do not comply with all federal, state, regional, county, local laws, rules, regulations, plans and programs. SCAG has a legal mandate to support compliance.

SCAG and the Connect SoCal PIER does not have the resources and capacity to evaluate all projects for compliance with all federal, state, regional, county, local laws, rules, regulations, plans and programs. SCAG has a legal mandate to support compliance.

SCAG and the Connect SoCal PIER have no criteria and metrics to evaluate project compliance with air quality and greenhouse gas reduction requirements in laws, rules, regulations, plans and programs. SCAG and the Connect SoCal PIER cannot rely on the California Air Resources Board and the Air Quality Management District SIP's for compliance. SCAG has a legal mandate to support compliance.

The last California and South Coast AQMD SIP's were rejected by the U.S. EPA for non-compliance. SCAG and the Connect SoCal PIER does not the resources and capacity to evaluate all projects or proposed SIP's for compliance with all federal and state SIP requirements. SCAG has a legal mandate to support compliance.

SCAG and the Connect SoCal PIER has the authority and mandate to identify and recommend mitigation for project EIR/EIS/EA's etc. that claim that they are "Significant and Unavoidable".

Example I: Zero Emission Electric Buses are currently available for all public transportation needs.

Example II: Zero Emission Electric Trains are currently available for all public transportation needs.

Example III: Zero Emission Heavy Duty and Light Duty Freight On-Road and Off-Road Trucks are currently available for all Short Hauls of less than 100 miles.

Example IV: Zero Emission Construction Equipment is currently available for 90% of all categories.

Example V: Zero Emission Electric Power is currently available for all lighting categories.



Example VI: Zero Emission VOC Paints are currently available.

Example VII: Emissions Capture & Treatment Technologies are available for all Freight Ship categories. AMECS-Advanced Maritime Emissions Control System, a CARB Certified Technology.

As described in the Regulatory Framework, when a region is in nonattainment for any of the six criteria air pollutants relative to the NAAQs, the federal CAA requires states to develop SIPs to achieve the federal standard. The AQMPs are required as part of the SIP. Within the SCAG region, the 8-hour federal ozone standard is designated as nonattainment for all six counties. San Bernardino, Riverside, Orange, Los Angeles, and Imperial Counties are all designated as nonattainment for PM<sub>2.5</sub>. Additionally, San Bernardino, Riverside, and Imperial Counties are designated as nonattainment for PM<sub>10</sub>. As a result, all the SIPs in the SCAG region focus on reducing ozone emissions and may also focus on particulate matter pollution. The following air quality plans are applicable to Connect SoCal: 2016 SCAQMD Air Quality Management Plan (AQMP), AVAQMD Federal 75 ppb Ozone Attainment Plan (2017), MDAQMD Federal 75 ppb Ozone Attainment Plan (2017), 2016 Ventura County Air Quality Management Plan, and Imperial County 2018 Annual PM<sub>2.5</sub> State Implementation Plan.

The goals of the air quality management plans and attainment plans are to establish a strategy for achieving the standards by a set date by listing all feasible control measures, including transportation control measures. These control measures help advance the attainment date and are financially, economically, and socially feasible. As standards become more stringent over time, achieving the standards becomes a moving target that the air quality districts, and air-related plans must continue to chase. At this current snapshot of time (2019), the Plan would not conflict with the existing air-related plans since it will align with feasible Transportation Control Measures (TCMs). SCAG coordinates with air districts in the region to ensure that air quality management plans (and air pollution control plans) are consistent and comprehensively address air pollution from all sources (as appropriate) in the SCAG region. For example, the 2016 SCAQMD AQMP was developed in alignment with the 2016 RTP/SCS, incorporating the latest scientific, technological, and regulatory information and planning assumptions as of January 17, 2017.<sup>125</sup>

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<sup>124</sup> Southern California Association of Governments. 2019. *Transportation Conformity Analysis Draft Technical Report*.

<sup>125</sup> SCAQMD. 2015. *2016 AQMP Updates Coordination with SCAG & CARB*. Available online at: [http://www.aqmd.gov/docs/default-source/Agendas/STMPR-Advisory-Group/stmpr\\_073015\\_5.pdf](http://www.aqmd.gov/docs/default-source/Agendas/STMPR-Advisory-Group/stmpr_073015_5.pdf), accessed October 29, 2019.

*As the scientific methods for the study of air pollution health effects have progressed over the past decades, adverse effects have been shown to occur at lower levels of exposure. For some pollutants, no clear thresholds for effects have been demonstrated. The new findings have, in turn, led to the revision and lowering of National Ambient Air Quality Standards (NAAQS) which, in the judgment of the Administrator of the U.S. EPA, are necessary to protect public health. Chapter 8 of the draft 2016 AQMP provides an overview of the extensive, multi-year, public process involved in setting federal air quality standards. Assessments of the scientific evidence from health studies is an important part of the process, and has helped inform revisions to the federal air pollution standards. Figures [included in the AQMP] are meant to convey some of the historical context to recent revisions to the NAAQS for ozone and for particulate matter, with regard to key developments in the understanding of the health effects of these pollutants.*

### **Mitigation Measures**

#### SCAG Mitigation Measures

**SMM-AQ-1:** SCAG shall develop the Southern California Disadvantaged Communities Planning Initiative which would provide funds to selected applicants to develop a low-cost, high- impact model which leverages SCAG's staff, data, and outreach resources to deliver context-sensitive plans in high-need, low-resourced active transportation infrastructure and frameworks. As part of the initiative, the model will be operationalized through the development of plans in six communities and refined to provide a sustainable resource for SCAG staff partner with local agencies to develop local active transportation plans.

**SMM-AQ-2:** SCAG shall continue its commitment to analyze public health outcomes as part of Connect SoCal. As part of the public health analysis for the Plan, SCAG shall continue to analyze the Plan's impacts on air quality through its Public Health Working group and continue to support policy change at the city and country level through education programs.

**SMM-AQ-3:** SCAG shall continue to conduct air quality-related technical analyses on the region, specifically in vulnerable areas that are typically environmental justice areas. For example, SCAG staff conducted technical analysis of emissions impacts on populations within 500 feet of freeways and highly travelled corridors in the Connect SoCal Environmental Justice Appendix. SCAG staff shall also continue to work with districts and relevant stakeholders to be informed of any updates new and/or changes to air quality issue areas through various forums like the Environmental Justice Working Group.

**SMM-AQ-4:** SCAG shall develop and fund a Zero Emissions Technology Clearing House which will identify all currently available Zero Emissions Technologies.

- SMM-AQ-5:** SCAG shall develop and fund an Emissions Capture and Treatment Technology (ECT) Clearing House which will identify all currently available ECT Technologies for unique industries.
- SMM-AQ-6:** SCAG can request a project include a Health Impact Assessment to determine the current public health status and to establish a Public Health Baseline to assure that proposed Mitigation Measures and other proposed polices and measures do in fact improve public health. Health Risk Assessments (HRA's) only tell you how many people might die due to a project.

Project Level Mitigation Measures

**PMM-AQ-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Minimize land disturbance.
- b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.
- c) Cover trucks when hauling dirt.
- d) Stabilize the surface of dirt piles if not removed immediately.
- e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.
- f) Minimize unnecessary vehicular and machinery activities.
- g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
- i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.
- j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction

the differences in sensitivity to carcinogens during early life exposure. OEHHA recommends a default ASF of 10 for the age range between the third trimester of pregnancy through two years, and an ASF of three for ages two through 15 years.

As a conservative measure to characterize maximum potential exposures of sensitive receptors to carcinogenic risks, residential exposures are assumed to begin in the third trimester and exposures of children at schools is anticipated to begin at the lowest educational grade level. The OEHHA guidance provides recommended DBR values that are specific to the age of the receptor and the type of activity in which the receptor would be engaged during exposure, which are evaluated on a case-by-case basis. Air districts in the SCAG region (including SCAQMD) have not adopted guidelines to implement the 2015 OEHHA HRA guidelines for construction and indicated it is currently considering how to implement the guidelines. Only one air district -- the San Joaquin Valley Air Pollution Control District -- appears to have adopted guidelines to implement the 2015 OEHHA HRA guidelines. BAAQMD is undergoing a process to implement guidelines as well.

The specific size and location of future construction activity within the SCAG region is not known, (Not True SCAG maintains a list of 100's of proposed projects with descriptions within its jurisdiction) and therefore many variables related to characterizing potential exposures to air toxics during construction activities could not be determined, such as proximity to the emissions sources and duration of exposure. Connect SoCal's Project List (See **Appendix 2.0**) includes transportation projects through 2045, however a construction health risk analysis would be speculative given the lack of a construction location and construction activities. However, it is reasonable to assume that some level of construction activity would occur adjacent to sensitive receptors (e.g., residences and schools). The significant construction emissions identified above, could result in adverse health effects to sensitive receptors. As such, it is likely that intense construction activities (e.g., from development projects that involve a high volume of haul trucks) would exceed the health risk significance thresholds due to equipment and truck exhaust emissions. This is considered a significant impact related to substantial pollutant concentrations during construction activities.

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### **On-Road Mobile-Source Emissions**

Mobile source (heavy-duty truck) diesel emissions, specifically DPM, are the primary source of health concern in most urban areas in the SCAG region. Mobile DPM emissions in the SCAG region are anticipated to decrease as compared to existing conditions. Additionally, from 2019 to 2031, passenger and light daily truck PM<sub>2.5</sub> is expected to remain constant, while heavy-duty PM<sub>2.5</sub> emissions

### 3.11 LAND USE AND PLANNING

This section of the Program Environmental Impact Report (PEIR) describes the existing land use characteristics within the SCAG region, identifies the regulatory framework with respect to laws and regulations that affect land use and planning, and analyzes the potential impacts of the Connect SoCal Plan (“Connect SoCal”; “Plan”). In addition, this PEIR provides regional-scale mitigation measures as well as project-level mitigation measures to be considered by lead agencies for subsequent, site-specific environmental review to reduce identified impacts as appropriate and feasible.

In 2019 the Tishman Environment and Design Center published a report titled. “Local Policies For Environmental Justice: A National Scan.” The report provides a comprehensive look at recent efforts in 23 cities, three counties and two utilities across the United States to address environmental injustices through innovative reforms of zoning, land use, and other local policies.

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The Draft PEIR fails to reference the California Air Resources Board - AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE, April 2005.

16

The Draft PEIR fails to reference the South Coast AQMD - Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning,” May 6, 2005.

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We request that SCAG reference relevant information and incorporate mitigation measures that address project impacts in these three documents.

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#### 3.11.1 ENVIRONMENTAL SETTING

##### 3.11.1.1 Definitions

**Agricultural Lands** Land designated for farming; specifically the production of crops and rearing of animals to provide food and other products.

**Air Quality Management Plans:** The Air Quality Management Plan (AQMP) is a plan prepared by local air districts and is a regional blueprint for achieving air quality standards and healthful air.

**Buffer Zone:**

**Carbon Sequestration** The ability for natural elements such as forests, soils and oceans to store carbon instead of releasing it into the atmosphere, preventing GHG Emissions.

Clean Up Green Up Supplemental Use District – Los Angeles Municipal Code Ordinance to reduce cumulative health impacts resulting from incompatible land uses, establish a citywide Conditional Use for asphalt manufacturing and

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refinery facilities, and increase the notification requirement for projects within a surface mining district within Boyle Heights, Pacoima/Sun Valley, and Wilmington.

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**Complete Communities** Suburban communities that provide a mix of land uses in strategic growth areas, wherein most daily needs can be met within a short distance of home. Complete communities provide residents with the opportunity to support their local area and run daily errands by walking or bicycling rather than traveling by automobile.

**Cumulative Impact:**

**Disadvantaged Community:**

**Environmental Justice Community:**

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**Established Community:** Refers to a place where there are existing populations of people that have been living in that place for some period of time. The term is used in Appendix G of the *CEQA Guidelines* under the land use thresholds of significance

**Farmland:** §21060.1(a) of CEQA (Public Resources Code §§21000-21177) delineates the consideration of agricultural land to include “prime farmland, farmland of statewide importance, or unique farmland, as defined by the United States Department of Agriculture (USDA) land inventory and monitoring criteria,

*Mitigation Measures*SCAG Mitigation Measures

**SMM LU-1:** SCAG shall coordinate with local County Transportation Commissions, Caltrans and other implementing agencies when siting new facilities or expanding existing facilities in, adjacent or near residential areas to facilitate minimizing future impacts of transportation, warehousing, air pollution emission facility projects on established communities, through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts to promote best planning practices.

**SMM LU-2:** SCAG shall coordinate with local cities and their planning, transportation and environment departments and commissions when siting new facilities or expanding existing facilities in, adjacent or near residential areas to facilitate minimizing future impacts of transportation, warehousing, air pollution emission facility projects on established communities, through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts to promote best planning practices.

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Project Level Mitigation Measures

**PMM LU-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Facilitate good design for land use projects that build upon and improve existing circulation patterns
- b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:
  - Selecting alignments within or adjacent to existing public rights of way.
  - Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.
  - Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).





**From:** Cynthia Robin Smith <diamondbarbeautiful@gmail.com>

**Sent:** Friday, January 24, 2020 4:58 PM

**To:** 2020 PEIR <2020PEIR@scag.ca.gov>

**Subject:** Comments SCAG Connect SoCal Plan + PEIR

Attached, find public/independent comments for the SCAG Connect SoCal Plan and the Program Environmental Impact Report, due by January 24, 2020, 5 p.m. Please put this data on the public record also.

Dear Sirs,

Thank you for the opportunity to provide comments and technical information pertaining to the City of Diamond Bar, conservation/open space element, general plan 2040 input.

Please be advised, at present, we see no biological elements, natural open space nor special status species present on your map for the City of Diamond Bar, and the SEA 15 area to the south, including Tonner Canyon and the Puente Chino Hills Wildlife Corridor.

Attached is a comments letter along with scientific biological reports on existing conditions in these areas. Please update your information as per this input.

Thank you.

C. Robin Smith, Chair

Diamond Bar - Pomona Valley Sierra Club Task Force, Angeles Chapter

Cynthia "**Robin**" Smith, Editor, Research & Development, Naturalist

**Diamond Bar Is Beautiful Blog:** [www.diamondbarisbeautiful.com](http://www.diamondbarisbeautiful.com)

*California Native Trees, Landscapes; Wildlife Habitat Conservation*

**Diamond Bar - Pomona Valley Sierra Club Task Force, chair**

**A Public Benefit, Non-Profit Organization**

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## **Diamond Bar – Pomona Valley Sierra Club Task Force**

January 24, 2020

Draft Connect SoCal Plan Comments  
Attn: Connect SoCal Team  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017

RE: Comments for PEIR, Natural & Farmlands Conservation

Dear Connect SoCal Team:

Thank you for the opportunity to comment on the Southern California Association of Governments 2020 Regional Transportation Plan and Sustainable Community Strategy, collectively called *Connect SoCal*.

The Diamond Bar – Pomona Valley Sierra Club Task Force, Angeles Chapter, has worked since 2018, to recognize, conserve and restore wildlife habitats, corridors and natural resources in the City of Diamond Bar and surrounding areas. We wholeheartedly believe in first, “doing no harm” to existing natural lands conditions, whilst prioritizing “natural climate solutions” through the conservation and restoration of local green belts, watersheds, residential landscapes, parks and open spaces. Our task force is proud to participate in the growing SCAG plan coalition in 2020.

The Diamond Bar – Pomona Valley Sierra Club Task Force, Angeles Chapter, is a community service/public benefit non-profit group, serving Los Angeles County, and the cities of Diamond Bar, Pomona, Walnut, Rowland Heights, La Verne, Claremont, San Dimas, Glendora and Chino Hills. Our mission is to educate, advocate environmental literacy and ecological integrity at the local level in conserving wildlife habitats, natural landscapes, watersheds, wetlands, California Native residential gardens, public parkland and natural open spaces.

We have had important successes since our inception, including the official mapping of rare and endangered species (California Gnatcatcher, Cactus Wren, Golden Eagle) in the City of Diamond bar, and creating a conservation element report: City of Diamond Bar Biological Resources Report by Hamilton Biological, which informs the city’s 2040 General Plan update.

We offer the following comments on the Natural and Farmland policy, goals, and next steps.

#### Natural Communities Map Correctives

At reviewing the PEIR and Natural & Farmlands habitat, special status species and wildlife movement maps, we noticed your data does not include the latest, updated biological information for the City of Diamond Bar, SEA 15 and the surrounding natural land areas.

We request that your drafts be corrected and updated by referring to the attached biological report and map, “City of Diamond Bar Biological Resources” report and “City of Diamond Bar, Natural Communities” map, dated February 25, 2020. These documents are referred to in the city’s recently adopted General Plan 2040 and are on record with the California Dept. Fish Wildlife Region 5 and the United States Fish and Wildlife Service.

Most notable updates should include the special status species “California Gnatcatcher,” which maps an old, established populations distributed throughout the city due to its quality coastal scrub habitats.

3

#### Prioritizing Natural Climate Solutions

We are pleased to see conservation of our natural and agricultural lands as one of the 10 main policies of Connect SoCal. Land preservation not only reduces greenhouse gas (GHG) emissions, but also sequesters carbon. Any investment in habitat restoration improves this sequestration potential as well. Natural lands (*green infrastructure*) are a proven “natural climate solution” and key to preserving quality of life and authentic community sustainability. We believe including land conservation is a step in the right direction. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful, and science-based role in mitigating impacts to our natural environment from transportation, infrastructure, and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. Thank you for your leadership.

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#### Mechanisms for Saving Natural Open Spaces – Wildlife Habitats

Our organization supports the idea that as new growth occurs it should be focused in existing city-centers and near transit. When developments are built in the city center, it relieves pressure from the fringe. However, the Plan fails to outline precisely how (or with what conservation mechanism) these fringe lands (or any lands) will actually be

protected. Relieving pressure by focusing development elsewhere, does not automatically conserve or protect natural lands. A growing alliance of numerous organizations, including ours, focus work on protecting important habitat lands. Much time, energy, money, strategy, and political will are combined to create a successful conservation transaction that leads to permanently-conserved lands. Further, just because local agencies may be contributing to the conservation arena, in no way should you discount the roles of the conservation non-profit community. In short, SCAG must identify the actual mechanism, process or plan on how the greenfields and agricultural lands will be protected.

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### The Benefits of Conservation

Many of the benefits of open space and parkland have been outlined in the Plan and Natural Lands Appendix. In addition, there are many economic benefits of open space. These are realized through increased property values, ecosystem services, support of local businesses through park visitor purchases, and a reduction in the urban heat island effect. Further, conservation of natural lands has many on-the-ground co-benefits like access to recreational opportunities, preservation of important habitats and species, protection of cultural and archeological sites, increased job opportunities, protection of threatened/endangered species, and environmental education experiences. Our natural lands also filter water, clean the air, and provide homes for wildlife. Natural lands preservation also protects our watersheds, rivers, and water sources. Voters consistently support measures that benefit their local water resources.

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Wildlife corridors are getting more and more attention these days. Ensuring survival of the top predator and the suite of species in the ecosystem means our natural lands must also maintain ecological functions, be sustainable over the long term, and include plans for long-term stewardship. The issue is that many housing and transportation projects eliminate the wildlife movement corridors and fragment the landscapes into smaller, less viable pieces of land. Natural landscapes are neglected due to regarding landscapes from only “aesthetic uses” attitude. Realizing the big picture by ensuring open spaces are connected to one another is essential for species survival and building authentic, sustainability. Wildlife corridors allow landscapes to maintain ecological functions, allow places for regeneration after natural disasters such as drought, fire, flood or landslide, and improve the resiliency in the face of climate extremes impacts. The Plan would be stronger if it supported the enhancement of and/or protection of documented wildlife corridors *prior to commencing* impactful projects.

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### Coastal & Riparian Assets

Many non-profits are working to ensure additional bays, estuaries, wetlands, bluffs, and beaches are preserved forever. Additionally, one way our coasts are connected to inland areas are through our watersheds, rivers and streams. These riparian areas serve as recreational trail corridors, water recharge and infiltration locations, and serve as places our wildlife use for watering sources. However, transportation and land use generated urban runoff are still problems. Our beaches and coastline are inundated with pollution. Litter, debris, and pollutants should be decreased prior to reaching the coast. Ensuring everyone has a positive experience on the sand and in the surf should be our goal, but we need to address Southern California's trash problem.

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### The Benefits of Habitat Restoration

California is one of 36 biodiversity hotspots on earth! This means, the unique ecosystem diversity of our state is rare and one of the most threatened by human activities. The health of California ecosystems affects the globe for good or ill, as well as local communities.

One key way to improve the environment is through restoration projects. These can be on land, in riparian areas, and even in the ocean. Restoration provides benefits by adding native plants, removing the non-native plants and their seedbank, as well as increasing carbon storage, and providing improved habitats for our wildlife. Our environment benefits from these improvements, as do our watersheds, our air, and our communities. Having improved habitats means that our water is cleaner, our soils won't erode as easily, it creates jobs for local residents, and our unique biodiversity is maintained. Further, the many endemic and threatened/endangered plants and animals benefit from these restoration projects as well. Thank you for including restoration as a key component in the natural lands and agricultural policy.

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Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix. Should you need to contact me, I am available at your convenience. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to

Sincerely,

*Robin Smith*

C. "Robin" Smith, Chair

**Resources & Attachment:** Hamilton Biological, "City of Diamond Bar Biological Resources Report" + "City of Diamond Bar, Natural Communities map"

**Diamond Bar – Pomona Valley Sierra Club Task Force**

324 S. Diamond Bar Blvd. #230

C. Robin Smith, Chair 909-861-9920 Desk

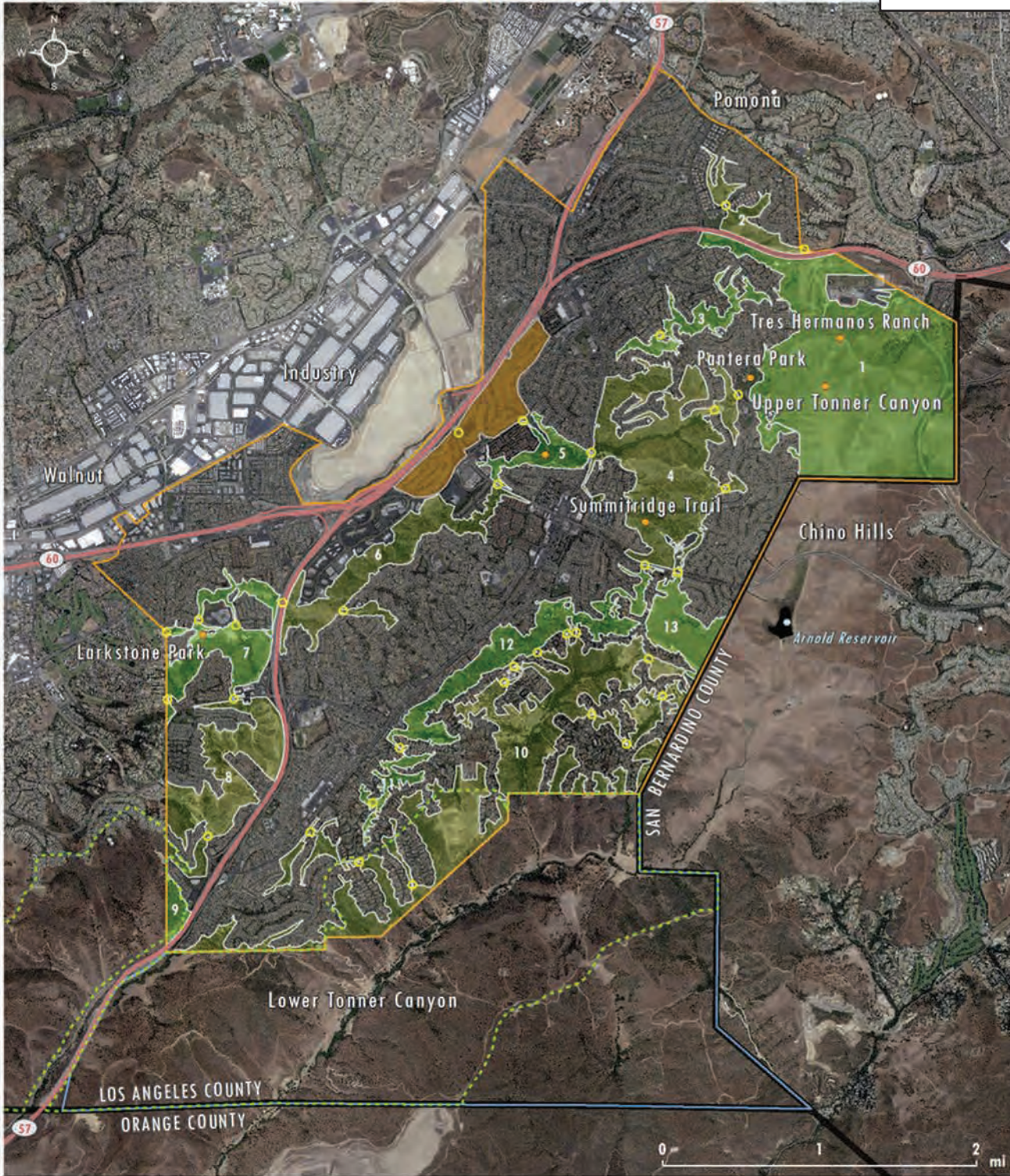
eMail: [DBPVSierraClubTaskForce@gmail.com](mailto:DBPVSierraClubTaskForce@gmail.com)

 **Diamond Bar – Pomona Valley Sierra Club Task Force**

# City of Diamond Bar








BIOLOGICAL RESOURCES Natural Communities

ORG-2



5

## Natural Open Space Areas

-  Diamond Bar City Limits
-  Sphere of Influence
-  Diamond Bar Golf Course
-  County Line
-  Natural Open Space Area
-  SEA 15
-  Potential Habitat Linkages/Choke Points



## HAMILTON BIOLOGICAL

World Image Basemap (Clarity) from ESRI, 2017. North American Primary Roads from ESRI, 2018. County Boundary from USGS. Diamond Bar City Limits, Significant Ecological Area (SEA prior OVOV / AV / GP adoption) Digitized from Los Angeles County, 2015. Map Projection: Universal Transverse of Mercator. Datum: WGS84. Map Scale 1:65,000. Graphic Scale Units: Miles.

The City of Diamond Bar natural open spaces are identified by “Natural Communities” (also known as “plant communities” or “vegetation types”) that occur in the city and its Sphere of Influence (i.e., Tonner Canyon/Significant Ecological Area 15, located in unincorporated Los Angeles County south of the city limits. Natural living ecosystems do not recognize man-made boundaries.)



**ANNUAL AND PERENNIAL GRASSLANDS, VERNAL POOLS/SEASONAL POOLS**

*Natural Open Space Areas: 1, 2, 6, 8, 10, 13, Sphere of Influence*



**COASTAL SAGE SCRUB, OPUNTIA LITTORALIS SHRUBLAND**

*Natural Open Space Areas: 1, 4, 7, 8, 10, Sphere of Influence*



**CHAPARRAL**

*Natural Open Space Areas: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, Sphere of Influence*



**COAST LIVE OAK WOODLAND, SAVANNAH**

*Natural Open Space Areas: 1, 3, 4, 6, 7, 8, 10, 11, 12, Sphere of Influence*



**CALIFORNIA WALNUT WOODLAND, SAVANNAH**

*Natural Open Space Areas: 1, 2, 4, 5, 6, 10, 12, Sphere of Influence*



**RIPARIAN SCRUB AND WOODLANDS**

*Natural Open Space Areas: 1, 4, 5, 6, 7, 8, 10, 12, 13, Diamond Bar Golf Course, Sphere of Influence*



**HUMAN-ALTERED HABITATS**

Developed areas, such as turfed/landscaped parks and the Diamond Bar Golf Course, generally do not support Natural Communities, but these areas may nevertheless play important ecological roles. For example, the golf course includes large number of ornamental trees that comprise a non-native woodland that supports a wide variety of resident and migratory native birds, presumably including nesting raptors, and the man-made lake provides habitat for migratory and resident waterfowl.

Details of these natural communities are stated page 9-12 in the Biological Resources report.



**From:** [George Hague](#)  
**To:** [2020 PEIR](#)  
**Subject:** Comments on the 2020 Draft Connect SoCal Plan and Draft Connect SoCal PEIR  
**Date:** Friday, January 24, 2020 4:28:00 PM  
**Attachments:** [Copenhagenize.jpeg](#)  
[State Attny general- Moreno Valley ignored environmental law when it OK.docx](#)  
[Brief Amici Curiae\\_Final \(1\).pdf](#)  
[Proposed Amicus Brief of Climate Policy Experts \(1\).pdf](#)

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Dear 2020 Connect SoCal Team,  
2020

Friday January 24,

Re: Comments on the 2020 Draft Connect SoCal Plan and Draft Connect SoCal PEIR

While I appreciate that conservation is one of the top ten goals, I am concerned that I do not see what will happen to make it so that we do not end up with a bunch of urban islands of habitat which will eventually lead to the weakening and death of most wildlife within. There needs to be connectivity over and under all your roads, Expressways Freeways and Boulevards which impede the movement of wildlife. These forms of connectivity must be able to help all forms of wildlife that need to use it to move freely from one area of habitat to another.

Below my name is a Press-Enterprise article concerning a two month old court ruling about a housing tract blocking Mountain Lions important movements— please read to the very bottom of it. I found it sad that the Western Riverside County Multi-Species Conservation Plan did not provide the leadership needed to protect this important Mountain Lion crossing and therefore the environmental community did. **"No funding for any 15 Freeway crossings has been raised so far."** (Press-Enterprise article found below) The words "Connect SoCal" must not only apply to people but to the wildlife which cannot speak for themselves. It therefore must be part of this plan to not only set aside sufficient funds for connectivity over and under new and improved projects, but must also have the all the necessary funds to go back and retroactively build new freeway/rail crossings to provide important linkages for the many different impacted species. City and County jurisdictions cannot be allowed to impede this much needed connectivity. I look forward to the final plan showing how "Connect SoCal" applies to the free movement of all forms of wildlife throughout southern California.

In the Moreno Valley area it is important to have connectivity—especially for the Fish and Wildlife 20,000 acres San Jacinto Wildlife Area (SJWA). This very special area are in two 10,000 acre units separated by a couple of miles as well as SR-79 and Gilman Springs Road. There are many sensitive, threatened and endangered species using these two SJWA units and they need to travel between them. There are no crossings over or under Gilman Springs Road and SR-79 doesn't have what is necessary for safe crossing of all these special species. As

**mentioned above the words, Connect SoCal must mean wildlife in addition to people.** The plan also needs sufficient money to go back and make right the missing connections/connectivity/linkages for all forms of wildlife from previous already built/approved projects. The Ramona Expressway is on the southern border of the SJWA and will probably use some of these funds and other sales tax money to expand its number of lanes. Again more crossings need to be planned so we do not make the world class SJWA an urban island. The Connect SoCal plans need to provide for the future viability of the SJWA and similar wildlife areas/open space to allow for sufficient linkages. A passenger rail system along the Ramona Expressway could easily happen with Connect SoCal help. SR-60 and the I-215 through Moreno Valley doesn't have any under or over-crossings for wildlife. Will Connect SoCal continue to propose building more and more roadways without fully considering wildlife? The plan needs to build on what other organizations have already produced in showing what linkages must be maintained, but go further for the well being of our planet as well as the enjoyment of future generations.

To meet our greenhouse gas (GHG) and air quality as well as Climate Change goals we must reduce vehicle miles traveled. We cannot just rely on electric vehicles, but they are important. Where in this plan is it providing charging stations for both cars and semi-trucks in enough sufficiency to help meet these goals? Where in the plan does it acknowledge induced traffic? Please include the cartoon below this paragraph which depicts what happens in most cases when more asphalt and cement are added to existing lanes = you build it they will come. It is accepted by most state leaders that you cannot build yourself out of congestion with more car/truck lanes.

1



The first consideration for additional lanes needs to be for public transportation. At least three times as much money needs to be put into this area as in adding vehicle lanes. If you ever go down the road of providing separate lanes for semi-trucks, then the only trucks that may be allowed to use them must be electric or zero emission.

In the area I live, the I-215 and SR-60 interchange or merging of the two freeways is at ultimate design buildout. Even though this is the case we continue to read that there will be efforts to raise the sales tax to widen SR-60 leading to this pinch point and the same is true of the I-215. This area is a beyond challenging most mornings heading west and woe be to all when there is even a minor accident.

If and when the 40 million sq foot World Logistic Center (WLC) is built, then its more than 14,000 daily diesel truck trips and its other 50,000 vehicle trips will make

Moreno Valley area a nightmare. They/you cannot build enough of anything to make it work and reduce its impacts on GHG and our non-attainment air quality as well as reducing impacts to Climate Change or as some say Climate Disruption.

Attached is a newspaper article and two amicus briefs filed January 10, 2020. The first is from the California Attorney General's office and California Air Resources Board expressing concerns over the WLC's impacts. The second is from CEQA and climate experts - Ken Alex, Dallas Burtraw, Ann E. Carlson, Fran Pavley, and Michael Wara. These two "friend of the court" briefs come from those who must implement AB 32 and one of its principal authors as well as the head of Office of Planning and Research (OPR) for many years. All three attachments are to be incorporated into my comments.

Projects like the WLC show the importance of rail for both people and goods.

SCAG knows the infrastructure is not there for the WLC and will never be available to accommodate its impact. As mentioned above the SR-60 and I-215 point of merging is already built to its ultimate design — what will happen if and when the WLC is built a few miles east of there?

I appreciate this opportunity to make some comments on this plan. As mentioned above please print out the three attachments as part of my comments for future documents as well as the article on Mountain Lions. Please continue to inform me of all future documents and meetings by using this email address and the P.O. Box found below.

Sincerely,

George Hague  
Sierra Club  
Moreno Valley Group  
Conservation Chair

P.O. Box 1325  
Moreno Valley, CA 92556-1325

Saturday, November 23, 2019

**WILDLIFE LAWSUIT**

## LEGAL WIN FOR MOUNTAIN LIONS

Judge tentatively rules that environmental report on Temecula housing development doesn't answer questions about the big cats

**By Martin Wisckol**

[mwisckol@scng.com](mailto:mwisckol@scng.com) @MartinWisckol on Twitter

Mountain lion attacks, like the 2004 Orange County mauling that marked California's most recent cougar-on-human fatality, underscore the ferocity the big cats can unleash on people.

But the danger humans pose to the lions of the Santa Ana Mountains is much broader — extinction.

That possibility unfolded in a man-versus-animal courtroom skirmish Friday, the result of a lawsuit brought by environmental groups hoping to block — or at least condense — the planned 1,750-home Altair development west of the 15 Freeway in Temecula.

Just before the hearing, Riverside Superior Court Judge Daniel A. Ottolia made his leanings clear when he issued a written tentative ruling. In it, he agreed with mountain lion advocates' claim that the environmental impact report filed by the developer failed to adequately address impacts on the area's lions

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### Lions

#### FROM PAGE 1

as well as on the rare western pond turtle and endangered San Diego ambrosia.

Lawyers for the city and the developer, Ambient Communities, spent much of the next hour defending the report. They have until Dec. 31 to present written arguments in hope that Ottolia will reverse course.

The stakes could be high. Although the 270-acre project would not be the sole cause of extinction for the Santa Ana Mountain cats, it could contribute to it, according to suit.

"This project could be the final nail in the coffin for the Santa Ana Mountains lions," said Center for Biological Diversity attorney J.P. Rose afterward, adding that he was "encouraged" by the tentative ruling. Rose's group is joined in the suit by the Sierra Club, the Mountain Lion Foundation and the Cougar Connection.

Mountain lions are regularly photographed by trail cameras in the area of the proposed development and the project is adjacent to an existing underpass that could allow the animals to travel to and from the much larger Eastern Peninsular ranges east of the freeway.

Largely hemmed in by development and freeways, Santa Ana Mountains cats face the threat of being unable to reproduce because of inbreeding and a lack of genetic diversity. A study earlier this year determined that they could become extinct in the area in the next few decades and that better access to the Eastern Peninsular ranges would greatly improve their odds.

### **City downplays impacts**

While a handful of lions have been documented making it over or under the freeway in the area, the subdivision would make such trips less likely, according to environmentalists and mountain lion experts.

"The Santa Ana Mountain lions are the most at risk of local extinction of any lion population in California, and possibly the United States," the environmental groups said in a court brief. The brief added that the project's environmental report "fails to inform the public and decision-makers of the Project's severe and permanent impact on the Santa Ana mountain lion population."

The brief also notes criticisms that the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Services filed over the environmental report.

The city of Temecula, which approved the project and the environmental report in December 2017, is the principal defendant in the case. It was joined by the developer in a response brief saying the environmental report met regulatory requirements and "the Project's impacts on mountain lions could be reduced to less than significant" provided the proposed 450,000-square-foot "civic" building at the southern end was reduced to the 20,000-square-foot nature center.

Concerns about the western pond turtle and San Diego ambrosia also were dismissed by the defendants, with the city's brief saying the impact on them would also be "less than significant."

The city brief noted that mitigation for environmental damage includes an estimated \$23 million for conservation efforts over the next hundred years. It also says that the project's footprint has been significantly reduced by rerouting a planned four-lane road known as the Western Bypass.

"From the very outset, Ambient sought to realign the Western Bypass to lessen impacts on the hillside escarpment, wildlife movement and conservation areas," the city's brief says.

Attorney Ginetta Giovinco, representing the city, held out hope for the project's current configuration despite the judge's tentative ruling.

"We certainly don't consider the case over," she said after Friday's hearing. "(Ottolia) will take another look at our position in light of our objections."

### **Wildlife underpass 'critical'**

While the lawsuit calls for city approval of the project to be invalidated, it notes that environmentalists have said they would be satisfied if the project were further

condensed and any building slated for the southern end is moved out of that area. On the 270-acre project site, 186 acres would actually be developed with buildings and roads. Environmentalists propose

reducing the developed area by 22%, to 145 acres.

"If the tentative ruling becomes final, it will require the city and developer to go back to the drawing board and revise the footprint," Rose said.

The smaller configuration would allow the lions more space to migrate along the hillside overlooking proposed development and, perhaps more importantly, it would create a larger buffer for the freeway underpass where Temecula Creek trickles into the Santa Margarita River.

The underpass is potentially a prime crossing area for mountain lions, although it is unknown if they have ever used it. Winston Vickers, a UC Davis veterinarian who researches mountain lions in the area, documented seven male lions crossing the freeway from 2001 to 2016, but six of those trips were verified by genetic analysis and it's not known exactly where they crossed. The sole lion tracked crossing the freeway while wearing a GPS collar made the trip at the Gopher Canyon Road underpass nearly 20 miles to the south.

At least four more lions were killed from 2013 to 2018 trying to cross on the freeway itself.

But Vickers' cameras have caught lions approaching the Santa Margarita River underpass. He said a variety of factors currently deter the animals from continuing through to the other side, including homeless people living in the tunnel, other foot traffic, dense brush, and noise and light from the freeway.

The underpass "is critical to mountain lion movement between the Santa Ana Mountains and the Palomar Mountains east of Interstate 15," according to Vickers and fellow mountain lion expert Kathy Zeller in a letter critical of the environmental report.

A Cal Poly Pomona report detailed possible wildlife crossings — a project initiated by Vickers — and produced a \$570,000 plan for improving the river underpass to make it more attractive to mountain lions.

The environmentalists' lawsuit says human activity around the underpass is likely to increase with a nearby subdivision and new trails, further deterring lions. The city counters that the project developer would make its own improvements so the tunnel is more inviting to lions, including the erection of barriers to discourage foot traffic.

### **Other possible crossings**

The Cal Poly study also produced a pair of potential crossings 2 miles to the south of the Santa Margarita River underpass that could connect the lions' 600-square-mile habitat in the Santa Ana Mountains with the vaster Eastern Peninsular ranges, which extend into Mexico. A single adult male needs about 150 square miles of habitat, with females needing far less, according to the National Park Service. This year's extinction

study estimated there were five adult males and 11 adult females in the Santa Ana Mountains.

An overpass in the southern area 2 miles south of the river was tagged at \$17.6 million while a lionfriendly culvert upgrade in that same area was priced at \$9 million to \$10 million. **No funding for any 15 Freeway crossings has been raised so far.**

A wildlife bridge in the general area proposed by the study has been endorsed by the city.

"A wildlife overpass for the I-15 ... is the most logical and effective means to restore mountain lion movement," according to a city court brief.

Vickers said a crossing in that southern area would not be affected by the Altair development but didn't want to give up on the Santa Margarita River underpass.

"You want to keep an existing crossing, especially when you don't know if or when the crossing to south will be built," Vickers told the Southern California News Group before the hearing. "I'm confident we can get the lions to cross at the existing underpass if we diminish human presence there."

That's consistent with what Vickers told the Southern California News Group in a 2018 report.

"We know they want to cross," he said. "Sometimes they'll come and sit near the freeway and watch it all day."

**"This project could be the final nail in the coffin for the Santa Ana Mountains lions."**

— *J.P. Rose, Center for Biological Diversity attorney*







Attn: Connect SoCal Team  
 Southern California Association of Governments  
 900 Wilshire Blvd., Ste. 1700  
 Los Angeles, CA 90017

RE: Draft Connect SoCal RTP/SCS Plan and Program EIR

Dear Team Members:

We write to followup on the comments we made during the Scoping Plan, as a civil rights organization focused on promoting minority home ownership and opposing government “redlining” actions that result in residential segregation and disparate harms to California’s minority communities.

1

We are deeply distressed that the draft Connect SoCal RTP/SCS Plan is even more forcefully aimed at ending minority home ownership opportunities in California’s most populous region, especially since the majority of the region’s residents are minorities – and especially since homeownership has long been recognized as the most successful pathway to the middle class and the intergenerational wealth accumulation that helps fund income interruptions from injuries or job losses, college expenses for kids, and other unplanned expenses for all family members. Senate Bill 375 expressly requires SCAG to develop and periodically update these regional plans to meet the region’s actual (not aspirational based on some “end capitalism” or “massively redistribute wealth” advocacy vision) housing and transportation needs. SB 375 also requires that these regional plans accommodate for continued economic growth (which we believe requires preserving upward mobility for California’s hard working minorities, as well as young people), and actually advance California’s climate leadership – not simply induce Californians to leave to other states to find housing they can afford to buy, allowing California to falsely claim a GHG reduction credit for reducing its population and in-state economic activities.

2

We are fully supportive of the SB 375 goals – but we oppose making minorities the collateral damage in California’s war on climate change. We oppose the RTP/SCS as an unlawful agency action to promote *de jure* residential racial segregation while exacerbating the adverse environmental, commuter health, and family welfare harms caused by intentionally increasing roadway gridlock. We further conclude that the Program EIR for the RTP/SCS is false, as well as wholly unlawful, for failing to acknowledge that the catastrophic physical, social, and civil rights consequences of the SoCal Connect plan’s high density infill rental housing, someone-else-should-ride-the-bus agenda, including further increases in homeless and poverty with attendant significant adverse health, safety, and environmental impacts. We support an “all of the above” strategy for solving the housing crisis, which brings a clear-eyed

3

recognition of what the region's families can actually afford to buy (and rent), and which matches the region's overwhelming transportation mode automobile choice with transportation plan solutions that actually work for people – not agencies, not staff, and not the legion of consultants who profit from taxpayer-funded planning that has not, and does not, work in the real world. SCAG's prior SB 375 plans did not reduce VMT: VMT increases with population and employment. SCAG's prior SB 375 plans were implemented when both the homelessness and housing crisis got much worse, not better. Professor Einstein said the definition of "insanity" is doing the same thing over and over again while expecting a different outcome. The SoCal Connect Plan is indeed insane: it provides neither housing nor transportation solutions that match the needs of the region, especially the needs of the region's minorities and young people.

3

We further support a rationale and transparent consideration of all regional greenhouse gas reduction strategies, not simply the fiction that Vehicle Mile Travelled (VMT) reductions for California families will actually meaningfully reduce global GHG. The fact is that SB 375's GHG reduction mandate was unlawfully converted into an unlawful VMT reduction mandate by the California Air Resources Board in an unlawful underground regulation "guidance" document that is no less than a bureaucratic putsch to end-run the Legislature's repeated refusal to mandate regressive (and ultimately racist) VMT reductions. By aiding and abetting CARB in this unlawful and racially discriminatory anti-housing and anti-transportation plan, SCAG joins CARB in violating the civil rights of the region's minority population while making zero – or negative – progress in reducing global GHG.

In fact, SB 375 did not authorize any agency, including SCAG, to make homeownership unattainable, worsen the homelessness crisis, and increase housing costs and make transportation more costly and less efficient for hard working minorities and young people. In adopting SB 375 the Legislature considered, and expressly rejected, requiring the reduction in Vehicle Miles Travelled (VMT) as a climate legal imperative in California. Later legislation to require VMT reductions have likewise failed, which is not surprising given the inherently regressive consequences of increasing commute durations and costs for the very people priced out of more proximate housing, the overwhelming ongoing dependence of Californians on cars and falling transit utilization, and the far more equitable and effective climate change strategies and mandates that have been adopted by the Legislature.

4

While CARB and its allies routinely assert that transportation is the largest GHG emission sector left in California, they omit the fact that the cars needed by people to get to and from work and attend to medical appointments, family care, and other routine family needs, are both increasingly cleaner – with more electric car mandates underway – and account for only a fraction of the plane, train, shipping, and heavy duty truck transportation sector GHG. They also routinely omit the fact that California already has a very low per capita VMT relative to other states outside the historic East Coast, that passenger car smog emissions have dropped by more than 99% through the methodical and transparent regulatory implementation of the Clean Air Act, that VMT has of course actually substantially increased – with the highest increase by far coming from Latino workers and families. They also ignore the fact that coastal Southern California already has the highest population densities in the United States.

We implore SCAG to resist the lure of redlining by elitist anti-car and anti-homeownership planners, and avoid violating civil rights, air quality, transportation, and housing laws to appease the takeover of land use decisionmaking by CARB to worsen California's homelessness, housing and poverty crises.

4

Residential re-segregation in Southern California is already well underway based on the housing crisis, which has caused a shortage of housing supply and skyrocketing housing costs in the region, and which has in turn resulted in relentless increase in the homeless population, and caused California to have the nation's highest poverty rate – and by far the highest poor population count based on US Census Bureau data. In even more accurate poverty data compiled by United Way of California, even when state public assistance is taken into account (e.g., assistance with rent, childcare, food and medical care), nearly 40% of Californians – disproportionately minorities, children, and seniors – cannot meet routine monthly living expenses. Struggling to Stay Afloat: The Real Cost Measure in California 2019, <https://www.unitedwaysca.org/realcost>. “Redlining” to exacerbate redlining remains endemic in California's government agencies through tools like the California Environmental Quality Act (CEQA): the most common target of CEQA lawsuits are housing, and within the SCAG region 14,000 housing units were challenged in just a three year study period. Virtually all (99%) of the challenged housing was in urbanized areas not greenfields, most (70%) was within one-half mile of the 2016 SB 375's priority transit areas, and most (78%) were in the region's whiter, wealthier and healthier communities rather than in the designated minority “environmental justice” neighborhoods suffering from higher poverty and unemployment rates, and lower educational and health outcomes, for residents. California Environmental Quality Act Lawsuits and California's Housing Crisis, Hastings Law School Environmental Law Journal, Fall 2018 [https://repository.uchastings.edu/hastings\\_environmental\\_law\\_journal/vol24/iss1/3/](https://repository.uchastings.edu/hastings_environmental_law_journal/vol24/iss1/3/)

5

The 200 has filed three civil rights lawsuits against state agencies that have weaponized CEQA as an anti-housing, anti-transportation redlining litigation cudgel to be deployed against housing that hard working minority families can afford to buy. The first lawsuit targeted CARB's four measures in the CARB scoping plan, including the unlawful VMT reduction mandate rejected by the Legislature; in unsuccessfully attempting to dismiss that lawsuit, CARB's attorneys argued that it was lawful for CARB to engage in racially discriminatory housing practices because housing was not a protected class. The second lawsuit sought disclosure under the Public Records Act of documents deemed by CARB and its allied agencies such as the Office of Planning and Research (OPR) to be “too controversial” for public release; attorneys for the state have employed a variety of litigation tactics to delay that lawsuit by nearly two years. The most recent lawsuit challenged the anti-housing 2018 expansions of CEQA regulations, and is attached hereto as a separate comment to this letter because SCAG's draft SoCal Connect Plan – like its unlegislated and unlawful CARB and OPR predecessors – is a violation of the state and federal constitutional due process and equal protection provisions, violates state and federal fair housing act laws, and violates air quality and transportation and land use laws, by distorting approved housing and transportation plans that have already been approved by voters, elected officials, and environmental and transportation agencies, to intentionally increase traffic congestion and intentionally curtail or even eliminate market rate housing that is actually affordable for purchase by the majority-minority median income workers in the SCAG region. Each paragraph in the attached Complaint is a separate comment, and

6

provides factual and legal evidence demonstrating that the draft SoCal Connect Plan is as unlawful as the discriminatory anti-housing regulatory expansion of CEQA.

6

The Program EIR for the plan is likewise unlawful under CEQA. The plan ignores the environmental consequences of its economically infeasible (to the vast majority of the region's residents, including especially minorities) high cost, high density infill-only housing plan, which will cause more homelessness, poverty, out-migration, and supercommutes. The San Francisco Bay Area, which has pursued this failed high density infill-only strategy for a decade, now draws workers from 21 counties – an explosion of “supercommuters” forced to live ever-greater distances away from the woke advocates who decided that global climate change required the wholesale adoption of bikes and scooters instead of cars, and 500 square foot one-bedroom apartments costing \$4000 per month. Even in the Bay Area, which has median incomes well in excess of Los Angeles, this fictional “housing plan” has left thousands of approved high rise apartments unbuilt because they are financially infeasible, and has created gridlock conditions so bad that even commuters in counties adjacent to San Francisco have earned “supercommuter” status by spending more than 90 minutes per day on the road.

7

The Program EIR's deficiencies span every single environmental impact section based on the document's willful omission of any analysis of the mismatch of the plan's housing and transportation “solutions” with the urgent housing and transportation needs of the community. If the plan called for a housing solution consisting of \$1 million mansions, it's racist and exclusionary character would be obvious. In fact the plan does something much worse, by calling for \$1 million small condos (or equally costly rental apartments), because high density and even medium density housing costs 3-7 times more to build than two story homes, duplexes and townhomes. If the plan called for a transportation solution that banned driving every Friday, those who must be physically present – on time – at their job to remain employed and be paid would be grossly harmed, while those in the “keyboard economy” of college graduates working on agency plans and studies could happily remain in their pajamas clacking away on their computers at home. In fact the plan does just that, with a VMT reduction mandate from CARB that is the equivalent of eliminating a weekday of driving. (Although called GHG reduction in the plan, but counted as a GHG reduction by CARB only if it derives from VMT reductions per CARB's unlawful underground regulatory “guidance” to SCAG and other MPOs). Construction workers, nurses, teachers, emergency responders, and the hundreds of other job categories that require physical presence on jobsites can't do their work wearing jammies in their kitchen – and these workers, and the region's economy, need a transportation system that actually works.

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Also included in this comment letter, as a separate comment for which responses are required, is the 200's lawsuit against the four anti-housing measures in the CARB scoping plan, which includes in detail the adverse physical consequences to the environment of these measures – inclusive of the VMT reduction mandate, and imposition of higher costs and litigation obstacles to housing. These are the same impacts ignored in the Program EIR for the draft SoCal Connect Plan.

9

The Program EIR is also fatally flawed in failing to acknowledge, and assess the impacts of, accommodating the 1.34 million new homes assigned to the region in the latest Regional Housing Needs Assessment (RHNA) cycle, or SCAG's preliminary allocation of new housing

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obligations among the counties and cities of the region which constitutes the best available information about the future location of this planned growth, or the SCAG Board’s endorsement of requiring most of the new housing units – 1 million – to be built in Orange and Los Angeles county. The 200 takes no position on whether this is an accurate housing number, or whether SCAG’s initial distribution of these units is appropriate or final. CEQA, however, requires that this additional housing be assessed as part of the cumulative impact analysis under every CEQA threshold of significance used in the Program EIR, and otherwise required by CEQA.

10

The Program EIR also violates CEQA by failing to identify, and implement, all feasible mitigation measures for each of the dozens of significant unavoidable impacts identified as consequences of SoCal Connect Plan implementation. CEQA requires the full and complete assessment even of feasible mitigation measures that are outside the jurisdiction and control of SCAG itself to implement or enforce, and includes the lead agency’s (SCAG’s) obligation to identify such measures as being within the jurisdiction and control of specified other agencies which SCAG believes can and should implement such measures. SCAG cannot escape CEQA compliance because it is politically difficult, technically complex, or requires an assessment of the reasonably foreseeable consequences of failing to provide housing solutions that the region’s people can afford or transportation solutions that the region’s people actually need.

11

The 200 implores SCAG, which has done tremendous analysis and work for decades, to apply its own knowledge to develop an alternative regional land use and transportation plan that actually does provide housing that is affordable for purchase by median income families, and transportation solutions that do ease congestion and reduce gridlock. Part of this solution is undoubtedly some high density housing in the wealthiest neighborhoods where \$1m condos and \$4000 rents are in fact affordable. Virtually none of the solution for median and above-median income families can be paid for by taxpayers, given the overwhelming needs and extraordinarily high cost of providing housing for the homeless, special needs populations, and the lowest income families. Practical solutions for solving the housing and transportation crisis will reduce GHG by preventing the need for people to move to high GHG states to find housing they can afford, and clean car and other transportation sector legal mandates will reduce GHG just as smog was reduced from a combination of emerging technologies and actual rulemaking rather than underground regulations.

12

The preparation and analysis of an alternate housing and transportation plan that actually complies with SB 375’s mandate to accommodate the housing, transportation, and economic expansion of the region will require recirculation of the Program EIR. An honest and legally adequate assessment of the draft SoCal Connect plan’s adverse environmental, health and safety consequences – and the legally adequate identification and assessment of feasible mitigation measures in and outside SCAG’s jurisdictional reach – will also require recirculation of the Program EIR. Finally, the legally required cumulative impact assessment of accommodating the RHNA housing allocation for the region – all of which is to occur within the earlier years of the planning horizon used in the SoCal Connect plan, will likewise require revision and recirculation of the Program EIR.

13

It is immoral, and unlawful, for any public agency in California to worsen the homelessness and housing crisis. It is immoral, and unlawful, for any public agency in

14

California to discriminate against minority families, or worsen poverty for the 40% of Californians who cannot meet their monthly expenses. SCAG has no history of such immoral and unlawful conduct, and – when handed a racially discriminatory and unlegislated mandate by a state agency like CARB – should resist the lure of joining in the long line of California agencies that engaged in intentionally discriminatory redlining practices. The 200 has two videos – the history of redlining, and CEQA as redlining – on its website at <https://www.thetwohundred.org/>. The 200 urges SCAG staff and leaders to reconsider the plan, and substantially revise the Program EIR.

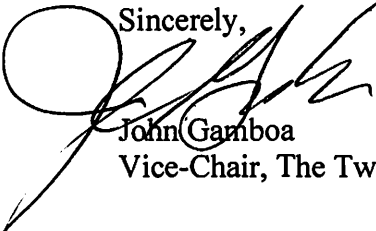
14

Finally, we understand that SCAG staff is concerned that delaying approval of the unlawful SoCal Connect Plan and Program EIR pending completion of a lawful and effective housing and transportation plan for the region could cause the United States Environmental Protection Agency (EPA) to determine that the region is in nonconformance with Clean Air Act mandates. Members of The 200 have a long history, and very high success rate, in persuading both federal and state agencies – with and without lawsuits – to stop engaging in racially discriminatory practices. Given California’s willingness to sue the current federal administration on environmental matters, and the emergency nature of the California homelessness and housing crisis, we would be pleased to assist SCAG in advocating for the necessity of a one year extension for the conformity determination. There is also precedent for this one year extension in San Diego. Unsubstantiated hypothetical fears of a delayed conformity determination to force approval of an infeasible and discriminatory housing and transportation plan is, bluntly, elevating bureaucratic bean counting over the actual needs of actual people.

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Please do not hesitate to contact us if you have any questions, would like any further information, or would like to discuss a consensual path forward. Some of our members have been civil rights leaders for more than 50 years, and had hoped that civil rights laws had finally addressed the decades of de jure racial discrimination by public agencies. We commend to your collective attention The Color of Law, by Richard Rothstein, which describes in detail the scores of residential housing discrimination practices inflicted on minorities by state and local agencies in California. Mr. Rothstein calls this the “forgotten” history of redlining in America. We have not forgotten, and stand ready to litigate – as a last resort – to prevent the recurrence of redlining under the bureaucracy’s new favorite label of climate change. We can reduce GHG emissions; we cannot deprive minorities of attainable homeownership and effective transportation solutions.

16

Sincerely,  
  
 John Gamboa  
 Vice-Chair, The Two Hundred

Attachments: The Two Hundred v. Office of Planning and Research  
 The Two Hundred v. California Air Resources Board

**Westwood South of Santa Monica Blvd**  
**Homeowner's Association**  
*Incorporated November 8, 1971*  
P. O. Box 64213  
Los Angeles, CA 90064-0213

January 24, 2020

Draft Connect SoCal PEIR Comments  
Attn: Roland Ok  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017  
Submitted via email: 2020PEIR@scag.ca.gov

Thank you for the opportunity to comment on the draft regional transportation plan whose many goals will guide transportation and land use policy and program for the coming years in the SCAG region through 2045. As stated in the opening chapter of the draft, the regional plan seeks to chart “a path toward a more mobile, sustainable and prosperous region by making key connections: between transportation networks, between planning strategies and between the people whose collaboration can make plans a reality.” While fulfilling this vision, it is important to note that the plan must do much more than merely coordinate transportation projects, reduce greenhouse gas emissions, meet federal Clean Air Act requirements, promote the preservation of natural and agricultural lands, promote measures that improve the public’s health, ensure the maintenance of roadways and transit infrastructure, provide needed support for good’s movement, promote the more effective use of our limited resource, usher in new technologies related to transport and transportation – all while supporting healthy and equitable communities and restoring endangered and fouled habitats (for all species as well as our human brothers and sisters). In short, this plan and future regional planning must usher in a form of policy evolution – a culture shift that must be sensitively and carefully advanced understanding the many factors involved.

Although laws can be passed and policies can be adopted, none will fully succeed without careful attention played to the human factors involved and to the careful design of transitions. As it pertains to the shift away from the Southern California car culture, SCAG and all its member governments are likely painfully aware of the need to build bridges between “what is” and “what must be.” What concerns me as I review proposed policies and laws, is the failure to acknowledge that the realities of the impacts of the transition cannot be ignored or be “sold” to the public by platitudes.

The public's exposure to the Connect SoCal plan through recent webinars and telephone town hall did not and could not "get into the weeds" of the plan. These overviews would not have led to an understanding of what will come to pass over time. They did not lead people to ask questions that get to the root of some of the challenges that we face in the implementation of a plan like Connected SoCal. The ability to make meaningful comment from the public's point of view, experience and background is quite limited – especially understanding that SCAG has worked with representatives of the region's member cities to seek input and incorporate those thoughts into the plan. How can we as laypersons make a contribution to this process?

We have observed and been recipients of the implementation of LA City policies that seek to support some of the same goals being sought in the Connect SoCal plan. Some of our thoughts in response to what we have seen in the rollout of those policies and the Connect SoCal plan follow:

- RE: Complete Streets
  - The emphasis on providing significant density bonuses to developments on what have traditionally been our communities' commercial corridors has resulted in the significant loss of local community serving merchants – the very backbone of retail and service providers needed in a community. Small retailers and service providers are often the first displaced tenants in the reorientation of commercial corridors into so-called mixed use development sites. However, it must be noted that the "mixed-use" developments are often nothing more than residential developments. In fact, Los Angeles' RAS mixed use development zone does not require a project to have a mixed use component. Further, many residential projects that claim to incorporate ground floor "live-work" units which are purported to be active pedestrian oriented uses are most often purely residential uses with no street orientation.
  - Creating purely residential communities with proximity to transit without providing for the community services and retail support for the growing dense population will require residents to travel distance to support their daily living needs.
  - Allowing residential development to occupy both commercial and light industrial/manufacturing zoned land (much the result of the very generous entitlement bonuses given to residential development) in the push to provide new housing will result in the need for those residents to have to travel far distances to reach their work locations. There is a clear need to identify and reserve land for job opportunity also near transit. Housing and jobs may not be coming closer together without more attention to the current realities.
  - Further: Re: Jobs and Housing balance: While we understand that the RHNA process has resulted in the placement of the bulk of new housing to be in the coastal zones of SCAG's region, we do not believe that it is a sound policy to rely on the coastal zone to absorb all new population – both because of the inherent higher cost of land in proximity to the coast (something seen worldwide), and the fact that each region as its own ecosystem has what we believe is a carrying capacity. The plan talks about the importance to preserve farmland and open space, but it does not address the need to provide for needed infrastructure such as open space in the urban areas of growing population density. Where is the



recognition of the need to develop urban open space, to develop greenbelts, to regulate the proximity of housing adjacent to transit corridors and noxious uses? Los Angeles City, with which we are most familiar, has land zoned for density to accommodate projected population growth. However, developers do not wish to build in all the areas where land would accommodate new growth. Yet, we are pressed to rezone neighborhoods often creating what many view to be a future unlivable city. With sewer and water mains bursting, with streets crumbling, how much added development can our urban areas absorb? The assumption that the urban areas are able to support large density increases is open to serious questioning. Many would challenge the statement made on page 12 of the project summary: "... by focusing new residential and commercial development in higher density areas already equipped with the requisite urban infrastructure."

What is the strategy to develop population centers with both jobs AND housing where land costs will result in affordable workforce housing and where these newer communities will not endanger agricultural producing land or sensitive habitats? What kinds of incentives can be developed to foster the establishment of job centers in these new population areas? These sub-regional job centers can be built with compact land uses that incorporate open space protections as well as urban open space. These are opportunities to build model communities in a more dense format than former single family home communities.

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- Regarding housing and the high cost of housing:  
We all agree that there is an affordable housing crisis and that there are no simple fixes. This "crisis" has been brewing for decades while real estate speculation, the mortgage crisis fiasco, foreign investment in CA property (with many properties left empty and no taxes assessed on them to encourage occupancy) and a growing short-term rental market that removed residential units from the housing market took hold. While Connect SoCal is a transportation program, it is important that these factors be noted and addressed for no current measures have addressed any of these contributors that have helped to bring us to where we are today and have placed added pressures on our housing supply.
- RE: The shift from automobiles to a more transit-oriented transportation realm.
  - This is an evolutionary process best accomplished by halting the demonization of drivers or the creation of an "us vs. them" battle. Innovative programs to incentivize transit use (when possible/realistic) and reduce vehicle use that are not punitive are needed.
  - Road maintenance and improvements must be supported by augmented fees levied on electric vehicles as well as those raised through gas tax funds. Policies that allow for annual fees on electric vehicles are important to reflect the use of the roads by these vehicles which currently may not be paying their fair share. However, we foresee potential backlash in the adoption of both a gas tax for road maintenance and a

use tax based on miles travelled. Should it not be one or the other? Whatever funding mechanism is adopted should build in an established adjustment for inflation without the need for further legislative action. Is it fair to seek both a mileage-based user fee AND a local road charge program?

- The possible investment of private equity firms in the construction and/or operation of transit will come at a future cost. We are concerned that decisions made are done with clear understanding of the cost to future users and how that compares with public financing options. Those discussions should be held in the open in a transparent manner.
- The placement of bike and bus only lanes that results in the intentional “traffic calming” on streets often comes with unintended consequences for nearby streets. Our streets have traditionally been characterized by their ability to carry different volumes of traffic. Our community supports streets designated to provide safe passage for bicyclists. However, we also believe that certain streets should be designated to move vehicles and not bicycle traffic. We are extremely concerned that the intentional slowing of traffic on arterials will result in the transfer of vehicles from the arterials to our local community streets – streets where we believe it is safest for pedestrians and bicycle riding. The adoption of “bus only” lanes will present some of the same challenges.
- Transit use: There are those who can easily access transit and there are those that cannot do so. Each of those groups has an additional subset—those who use transit and those who do not. It is likely unrealistic to expect that all can and will use transit. In some families, some family members will use transit and others will not/cannot do so. We must recognize that Los Angeles is a city that is separated by a mountain range – a mountain range separating valley and city areas. While METRO has current plans to connect the two areas by fixed public transit, we are not there yet. And yet, there are plans to levy user fees to riders who enter the Westside via “GO ZONES” – also known as tolling areas. So long as there are significant gaps in our transportation network, GO ZONES or local toll areas will be viewed as schemes devised to raise funds to help support transit development/maintenance. The proposed Westside GO ZONE now being discussed does not address the impacts on those who cannot adjust work shifts, of those who must access needed medical care within a GO ZONE area. This will strike those affected as yet another tax that is being levied to make up for otherwise unsound funding mechanisms for our transit/transportation infrastructure.
- The Westside has long waited to receive fixed public transit. The EXPO line exceeded ridership estimates from the minute it opened and yet frequency of trains has been reduced. The “Subway to the Sea” will not reach the sea and will end at the VA removing a major transit connection along a major travel corridor. The lower population levels in hillsides and substandard streets there will likely make it unlikely that transit can be justified to serve hillside residents (although microtransit may be helpful there). Why is the Westside being identified as the target of a tolling program? Why isn’t the downtown area, where major investments in transit, including the Downtown Connector) have been made and where

the Gold Line, Subway, Union Station, Metrolink all meet? Promises that low income drivers will somehow be subsidized if entering the area does not address the many issues presented by tolling in local communities.

- It is up to the transit providers to present an attractive and efficient option for prospective riders. It is an unfortunate fact that currently some of our transit options are not viewed by riders as realistic options. The reasons for this are many: Poor access to stations, lack of parking where transit options to reach transit are not available, unrealistically long travel times, perceived unsafe conditions ( particularly for women traveling along after dark), filthy conditions, unreliable service.
- First mile/ Last mile: Many transit riders and prospective transit riders cannot avail themselves to use scooters or bicycles and may not be able to reach transit on foot. The needs of those individuals need to be recognized and addressed. This is perhaps a growing challenge as the Baby Boomer generation ages. Data has demonstrated that Lyft/Uber-style ride providers are often major contributors to street congestion. Further, the safety of passengers in Uber/Lyft vehicles is becoming a growing issue suggesting that if our transit networks are to rely on these forms of transit then more regulation may be required.
- It is important for planners to recognize that vehicles will not disappear from our environment and that removing parking spaces in residential developments in the thought that this will stop people from driving is wishful and illusory thinking. Providing parking is necessary because not all members of a family will be able to use transit given their work responsibilities and the vast geographic area this region represents. Further, some jobs are shift jobs with irregular hours that do not conform to transit availability. Space provided for parking in buildings should be designed so that it can be repurposed in the future should need for that use be reduced. LA permits developments under the TOC/Transit Oriented Community Guidelines that provide ½ space of parking per unit – regardless of the number of bedrooms in those units. Some projects provide no/zero units assuming that those who live near transit will not own or have a need to park a loaned vehicle. Is this realistic? We think not. At the very least we suggest that data be gathered from all new projects that can help to document how many bicycle and automobile spaces have been provided, how many are in use, whether there are waiting lists seeking access to a parking space. We also suggest (and continue to do so) that projects permitted with bonus densities granted as a result of proximity to transit be required to provide new residents and employees FREE transit passes for an initial period of time, followed by discount pass provision upon proof of regular transit use. Those buildings have benefited from significant “upzoning” and development rights at no cost. They should be part of the process in supporting the use of transit whenever possible. Citizens should not need to have to suggest such a policy. It should be expected, particularly since more and more developments are being built “by right” with little opportunity for community members to participate in making suggestions for improvement.

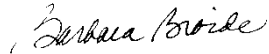
We are grateful that SCAG has made strong efforts to seek public participation in this effort. It is extremely troubling to us that measures to incentivize housing development have resulted in

the streamlining of the entitlement process that removes our input from the process. Even worse is proposed STATE legislation such as SB 50 that seeks to implement zoning from a statewide perspective – voiding local community plans and local planning efforts. We look to SCAG to be an advocate in challenging the disempowerment and silencing of the voices of local communities in the planning the future of our communities.

1

Thank you for your consideration.

Sincerely,



Barbara Broide  
President



**ARSAC Alliance for a Regional Solution to Airport Congestion**  
**7929 Breen Ave., Los Angeles, CA 90045**

**310 641-4199 [WWW.RegionalSolution.org](http://WWW.RegionalSolution.org) [info@regionalsolution.org](mailto:info@regionalsolution.org)**

January 24, 2020

Mr. Randal Ok  
 Southern California Association of Governments  
 900 Wilshire Blvd, Suite 1700  
 Los Angeles, CA 90017

Via email: [2020PEIR@scag.ca.gov](mailto:2020PEIR@scag.ca.gov)

Re: Comments to the Draft Program Environmental Impact Report (PEIR) (SCH#2019011061) in accordance with the California Environmental Quality Act (CEQA) for Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy).

Dear Mr. Ok:

Since 1995, ARSAC has advocated for the increased utilization of unconstrained underserved or unserved outlying regional airports such as Ontario and Palmdale to meet Southern California's airport capacity needs instead of expanding LAX.

ARSAC supports a safe, secure, modern and convenient LAX. LAX, the dominant So Cal airport, is limited in operational land and is in a very congested airspace. In 2016, ARSAC negotiated a second legal settlement to extend the 153 gate cap by four additional years through December 31, 2024. The gate cap is based upon Aircraft Design Group III sized aircraft comprised of the narrow body mainline aircraft such as the Airbus A320 and Boeing 737 series commercial airplanes. LAX is currently the largest public works project in Los Angeles County.

1

ARSAC is disappointed with the PEIR:

1. The outreach for public comment appears to very limited.
2. The time for public comment is too short. The PEIR was released in December when most people are paying attention to the holidays and not public policy. SCAG should extend the comment period an additional 45 days and provide lots of publicity to encourage public comment.
3. The content of the PEIR appears to be thinner in scope than in the past, especially the Aviation Element. Instead of doing the RTP right, it appears as "RTP Lite."

2

The draft document repeatedly states its lack of authority to mandate actions. SCAG can be a much stronger contributor to the economic and environmental development of this region by providing increased guidance for transportation priorities. It provides extensive housing priorities and goals and to increase mass transportation to reduce vehicle miles travelled. It appears to favor "active transportation" such as bikes and scooters but fails to project how will be used to generate meaningful data resulting in congestion improvement.

3

ARSAC strongly agrees with the five decade old principle that our airport system must provide a regional accommodation to travelers and cargo. Mass transit train stations and buses must be

4



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built to support our airport system. Much of the RTP discusses “livable communities” in which single vehicle traffic is discouraged for densified communities. The call for active mobility choices with inadequate parking may serve local communities, but this will not work well for travelers who generally have luggage. Bike centric projects may increase active transportation alternatives but it also reduces vehicle capacity and slows down vehicle traffic resulting in increased GHG.

Traffic around LAX is legendary. Despite all of the major changes proposed we expect that “Every day will be like Thanksgiving gridlock” if the increased projection of 127 Million Annual Passengers (MAP) occurs. No documentation is provided anywhere in the RTP to validate that this 35% increase from current gridlock can be accommodated within or around LAX.

ARSAC strongly encourages data collection and analysis activity to highlight the sources of passengers and to encourage airlines to offer flights at airports most convenient to travelers.

SCAG congestion analyses and “transportation analysis zones” around airports must be detailed enough to identify potential action for improvements not only at end of the planning period of 2045, but also incrementally to match changes within airport areas. When will this data be used? If it is only for 2045, then it will be too late.

In this RTP, SCAG seems to have backed away from 5 decades of advocacy for regional accommodation of commercial aviation needs. The wording, “Regionalization” in reference to Aviation is absent from the draft despite its critical importance to ensuring optimum access and emergency back up for both natural and man-made disasters.

The definition of regionalization has been crafted by ARSAC and the cities of Inglewood and Culver City in 2011 which SCAG should consider adopting:

“Regionalization is the proactive redistribution of a portion of Southern California’s aviation demand to unconstrained airports in the Southern California region other than LAX, in order to achieve a more equitable and proportional allocation of airport growth and aircraft operations among the airports, reduce congestion, increase safety, and minimize vehicle miles traveled, with consequent benefits to both the environment and the economy.”

ARSAC was part of the coalition to “SetONTario Free” whereby Ontario International Airport (ONT) ownership and management returned to local control. ONT has been dramatically increasing domestic service and adding new long-haul international service such as Taipei, Republic of China. ONT is a great example of airport regionalization in Southern California.



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We agree with the RTP statement: “SCAG has and will continue to play a role in terms of aviation systems research, planning, and analysis, as well as encouraging collaboration and communication amongst the region’s aviation stakeholders.”

As the federally recognized Metropolitan Planning Organization (MPO) for Southern California and its ability to prioritize ground transportation dollars, SCAG must do more to help underutilized regional airports become more attractive for airline service by providing easy access by road, rail (Metrorail, Metrolink, Amtrak, High Speed Rail such as Brightline/Virgin Trains) and other mass transit.

Part of Southern California’s freeway congestion problems stems from leakage of passengers from one airport catchment area (natural marketing area) to other airports causing millions of extra vehicle miles traveled. All of Palmdale Regional Airport’s possible passengers are forced to drive to Hollywood-Burbank (BUR), Ontario International (ONT) or Los Angeles International (LAX) to catch a flight. LAX has 70% of the region’s flights including 95% of the international flights. While it is not possible to accommodate all leakage from one catchment area to another, without airline service at places such as PMD freeway congestion will continue to increase. SCAG must work with airports in the region to have ground access projects prioritized. SCAG must re-commit itself to making airport regionalization a reality.

4

In the RTP, some airports having commercial jet service are designated “Reliever Airports”.

Were these “Reliever Airports” included in calculations such as Air Quality, Green House Gas Emissions, Noise, etc.???

Additional information that should be included in the RTP about “reliever airports”:

1. March Inland Port (RIV). As of 2018, Amazon Air has 6 cargo flights per day.

Reference: [https://en.wikipedia.org/wiki/March\\_Air\\_Reserve\\_Base](https://en.wikipedia.org/wiki/March_Air_Reserve_Base)

2. Palmdale Regional Airport (PMD). PMD has charter Boeing 737 flights to support US Defense projects such as the B-21 bomber program. The City of Palmdale is in the planning process to build a new passenger terminal on the northwest corner of Air Force Plant 42 (southeast corner of Sierra Highway and Avenue M). This location is adjacent to the Metrolink Antelope Valley Line and would be perfect for a train station stop to make PMD an intermodal and multimodal facility. Virgin Trains USA could also make this a station.

Reference 1: [https://en.wikipedia.org/wiki/Palmdale\\_Regional\\_Airport](https://en.wikipedia.org/wiki/Palmdale_Regional_Airport)

Reference 2: <https://cityofpalmdale.org/DocumentCenter/View/5858/Palmdale-Regional-Airport-Facts-and-Figures-PDF?bidId=>

Reference 3: [https://www.avpress.com/news/palmdale-explores-return-of-service-to-airport/article\\_c0ffc290-bbf9-11e9-8a1a-7fd9889b4667.html](https://www.avpress.com/news/palmdale-explores-return-of-service-to-airport/article_c0ffc290-bbf9-11e9-8a1a-7fd9889b4667.html)



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3. San Bernardino International Airport (SBD). SBD has a new passenger terminal with Federal Inspection Service (FIS) facilities. SBD has commercial aircraft Maintenance, Repair and Overhaul (MRO) facilities. FedEx and UPS have cargo flights from SBD to 9 US cities. Reference: [https://en.wikipedia.org/wiki/San\\_Bernardino\\_International\\_Airport](https://en.wikipedia.org/wiki/San_Bernardino_International_Airport)

4. Southern California Logistics Airport (VCV). SCLA is a major aircraft storage, maintenance, overhaul and testing facility. Boeing Capital Corporation, a subsidiary of The Boeing Company, stores aircraft here for future leases and sales. GE Aircraft Engines does flight testing of engines here including the new GE9X engine powering the new Boeing 777X. Airtanker 910, which has a McDonnell Douglas DC-10, uses VCV for fighting forest fires in California. Reference: [https://en.wikipedia.org/wiki/Southern\\_California\\_Logistics\\_Airport](https://en.wikipedia.org/wiki/Southern_California_Logistics_Airport)

4

**Main document comments and questions.**

1. RTP Page 1.03: “The region is home to the two largest container ports in the Western Hemisphere (Los Angeles and Long Beach), and the world’s fifth busiest airport system (Los Angeles World Airports).”

The statement above needs to be updated. According to Airport Council Internationals, Los Angeles International Airport (LAX) is the world’s fourth busiest airport as of 2018. Los Angeles World Airports operates LAX. LAX is on track to becoming the world’s third busiest airport according to first half 2019 figures. Reference: [https://en.wikipedia.org/wiki/List\\_of\\_busiest\\_airports\\_by\\_passenger\\_traffic](https://en.wikipedia.org/wiki/List_of_busiest_airports_by_passenger_traffic)

2. RTP Appendix 3.13. This document leaves out the noise contours for airports classified as “Reliever Airports.”

Palmdale (PMD), March Inland (RIV), San Bernardino International (SBD) and Southern California Logistics Airport (VCV) all have jet air traffic that impacts airport neighbors with noise, pollution and vibration issues. Are these reliever airports included in the air quality, greenhouse gas emission, noise and other analyses? If not, then the RTP could be inadequate in disclosing and analyzing these important issues.

5

**Aviation and Airport Ground Access Technical Report comments and questions**

1. Overall. SCAG must recommit to an active policy of “regionalization”, a policy that SCAG embraced for the past five decades. Why does SCAG no longer mention regionalization in the RTP? How can we get SCAG to implement regionalization?

6





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2. Executive Summary, page 2. “Only a small percentage of air passengers used transit to travel to and from the region’s airports.”

SCAG must work with airports in the region to identify and prioritize projects that will encourage passengers to use public and mass transit to airports. Hollywood-Burbank Airport (BUR) is a good local model of being an intermodal and multimodal facility. LAX is working on the Landside Access Modernization Program (LAMP) to improve mass transit connectivity. Plans to extend the Metro Gold Line and Metrolink to and from Ontario International (ONT) need to be prioritized.

3. Executive Summary, page 2. “The majority of air passengers in the region are traveling to and from Los Angeles International Airport.” Again, SCAG needs an active regionalization program to help redirect passengers who are leaking from other SCAG airports. This will help to reduce pressure on LAX to expand in the future and to reduce traffic congestion on freeways and local streets around LAX.
4. Executive Summary, page 2. “The growth in air passenger demand globally can be explained in part due to the health of the economy and an ongoing trend of decreasing airfare.”

The statement is correct, but leaves out important components of growing international air service: Open Skies Agreements between the United States and other countries which removed restrictions on city pairs and aircraft types and the use of new fuel efficient long range aircraft such as the Airbus A350XWB and the Boeing 787 Dreamliner that have made flying between smaller size markets profitable.

5. Exhibit 1, SCAG Region Airports, Page 4.

Why is Palmdale Regional Airport listed as “Palmdale Air Terminal” on the map?

6. Table 1, Commercial Air Carriers (and Destinations) Operating in the SCAG Region Airports, Pages 10 and 13
  - a. The list appears to be LAX-centric. Why was the list not broken out by individual SCAG airports with airlines and destinations?
  - b. The destinations are missing for Aer Lingus (Dublin), Aeroflot (Moscow), Aeromexico (Mexico City, etc.), Aeromexico Connect, Air Canada (Vancouver, Calgary, Edmonton, Toronto, Montreal), Air Canada Rouge and Air China (Beijing). Where did the information about “O&M Existing Service” and “Bridges, pavement” come from?
  - c. Why were these airlines not listed? Air Italy (Milan)? Boutique Air (Merced)? Finnair (Helsinki)?
  - d. Why are Air Canada and Volaris listed twice?



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- e. Norwegian Air Shuttle has reduced its destinations from LAX
  - f. Scandinavian Airlines just switched its destination from Stockholm to Copenhagen
  - g. Thomas Cook Airlines, WOW Air and XL Airways France have ceased operations.
7. Table 2, SCAG Region Cargo Airlines and Destinations, Pages 14 and 15
    - a. The list appears to be LAX-centric. Why was the list not broken out by individual SCAG airports with airlines and destinations?
    - b. Does this list account for Amazon's Prime Air operation at March Inland Port (RIV)?
  8. MPO's have no authority over Airport Development, Pages 18 and 19. Please refer to our comments above concerning active regionalization.
  9. Where are air passengers coming from and how are they getting to the airport?, Pages 24 to 26. Again, SCAG has an opportunity and a responsibility to work with airports in facilitating projects to create and enhance mass transit projects to airports to encourage more air passengers to use transit options other than single occupancy vehicles or Transportation Networking providers.
  10. Air Cargo traffic to the SCAG region airports, Page 26. Why did SCAG only include the top 5 cargo airports in the SCAG modeling program for truck trips? Other airports such as San Bernardino (FedEx and UPS) and March Inland Port (Amazon Prime Air) produce truck trips. It is anticipated that these 2 airports will likely see increases in cargo service from these cargo carriers and this will impact roadways with more truck traffic.
  11. Strategies, Page 31. Again, SCAG must be more pro-active in working with SCAG region airports on ground access to make these airports more intermodal and multimodal.
  12. Table 12, SCAG Region Airport Forecast for 2020-2045 RTP/SCS, Page 33. What documentation and justification has LAWA provided for the projected 127 Million Annual Passengers in the 2045 horizon year?
  13. General Aviation Forecast, Page 34. Does the forecast include the possible closure of Santa Monica Airport (SMO)? Does the forecast include membership flying services such as SurfAir and FLOAT?
  14. New Airport Ground Access and Modernization Projects, Pages 34 to 36. ARSAC appreciates that the 2028 Olympic Games are mentioned, but again, it appears that there is lack of urgency in this RTP to have airport access projects completed before the Olympic games making the airports in the SCAG region, "Olympics ready." ARSAC supports efforts to bring Metrolink and Metrorail to Ontario International Airport (ONT).
  15. Supersonic aircraft missing from RTP. Supersonic passenger aircraft are expected to debut during the 2020-2045 timeframe of the RTP. These include the Boom Technology Overture and Aerion AS2 supersonic business jet. Boom has 10 options each from Japan Airlines and Virgin Atlantic, both of whom serve LAX.  
 Reference 1: [https://en.wikipedia.org/wiki/Boom\\_Technology](https://en.wikipedia.org/wiki/Boom_Technology)



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Reference 2: <https://en.wikipedia.org/wiki/Aerion>

16. Drones also missing from RTP. Drones are being deployed for law enforcement and commercial purposes such as filming and package delivery.
17. Helicopters also missing from RTP. Helicopters are used law enforcement, fire fighting, medical, news coverage and private transportation. Helicopters negatively affect residents when they fly low.
18. VTOL. New services such as Uber Elevate are on the horizon. This service will require new landing pads to enable its usage. The safety of manned and unnamed VTOL needs to be examined. From Wikipedia: "UberAIR / UberElevate will provide short flights using VTOL aircraft. Demonstration flights are projected to start in 2020 in Dallas and Los Angeles. Commercial operations are projected to begin in 2023.[48] Although technically feasible, the program is expected to encounter safety and regulatory obstacles.[49]"

Reference: [https://en.wikipedia.org/wiki/Uber#Riding\\_with\\_Uber](https://en.wikipedia.org/wiki/Uber#Riding_with_Uber)

**Passenger Rail Technical Report comments and questions**

1. Table 1, Private Transportation Providers, Page 18. Destinations are missing for Tres Estrellas de Oro and TUFESA.
2. Los Angeles to Las Vegas, Page 27. Was XpressWest and its successor Virgin Trains USA approved for a Palmdale to Victorville segment? Why is this not mentioned about a Virgin Trains station in Palmdale?
3. Airport Ground Access, Page 33. Were the City of Palmdale's plans for a new airport terminal on the northwest corner of Air Force Plant 42 (southeast corner of Sierra Highway and Avenue M) considered in this RTP?

ARSAC will continue to work with SCAG to improve our regional economic and environmental conditions. We encourage SCAG to increase its outreach and to foster discussion and action within each of the Counties and Cities of our region.

Sincerely,

Denny  
 Schneider  
 President  
[denny@welivefree.com](mailto:denny@welivefree.com)  
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Robert Acherman  
 Vice President  
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January 24, 2020

Roland Ok  
Southern California Association of Governments  
900 Wilshire Blvd, Suite 1700  
Los Angeles, CA 90017

SUBJECT: "Connect SoCal" DEIR Comments

On behalf of BizFed, a grassroots alliance of more than 190 business organizations representing 400,000 employers with over 3.5 million employees in Los Angeles County, we want to thank SCAG for the great work in presenting this plan to many diverse stakeholders in Southern California.

We see great things in the plan that we strongly support, such as increasing housing production, leveraging investments from enhanced infrastructure financing districts (EIFD), supporting 5G Smart Cities, and supporting increased public transit and Metrolink service. However, we heed caution to the calls for imposing vehicle miles travelled (VMT) reduction targets and the fees attached to them as a strategy for greenhouse gas (GHG) reduction. This strategy and its fees have negative impacts on disadvantaged communities. We view this as counterproductive to BizFed's anti-poverty goal of lifting one million persons in Los Angeles County out of poverty over this decade.

California ranks at the top in the United States for poverty and homelessness – both of which are attributable directly to the housing supply shortage, high housing prices that are nearly three times above the national average, and longer commutes where working families are "driving until they qualify" for housing that they can rent or buy.

The call for user based vehicle mileage travel fees - in Chapter 5 of the Environmental Justice section of the plan - will hurt the very people who are most disadvantaged. These workers are paying more as they travel farther to work at a good paying job and afford a place to live, thereby spending more of their income on basic necessities such as transportation and shelter.

BizFed recognizes the call for increased public transit service and multi-family transit-oriented housing production as a strategy to mitigate those concerns. We believe the implementation of these goals will be hampered by CEQA lawsuit abuses. Since 2013, over 70% of these CEQA lawsuits are targeted at stopping infill, multi-family, and transit-oriented housing. According to CARB, these are housing types are needed to invest and support our environmental goals.

In 2012 and 2016, SCAG's two prior RTP/SCS met the required GHG reduction targets. The RTP/SCS were the result of local input on land use planning, full respect for voter-approved funded transportation infrastructure projects as required by longstanding laws for efficient transportation and goods movement solutions.

These voter approved transportation projects are mostly funded from sales taxes which can be volatile to outside triggers such as the recession of 2008-10, resulting in a decrease of sales tax receipts. If these assumptions on VMT reductions, in the RTP/SCS, are to be delivered, we may see dramatic reductions in goods movement infrastructure and sales tax receipts, which are critical to the state's economy. The last time a significant reduction in VMTs occurred was during the recession of 2008-2010. However, with the current trends in e-commerce as well as alternative transportation mobility options such as Uber and Lyft, we have seen VMT's increase.

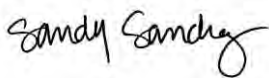
BizFed believes there is an opportunity to include in this plan strategies that will help deliver our housing and mobility goals. We want to partner with SCAG in making these goals a reality. We believe that policy tools such as; the return of community redevelopment agencies, leveraging tax increment financing to invest in affordable housing projects, and CEQA reforms against lawsuit abuses for transportation infrastructure projects and housing developments of all kinds both urban and rural, are essential to the conversation that will successfully implement this bold, economically and environmentally sustainable vision SCAG has laid out in the plan.

1

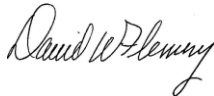
We appreciate SCAG's steadfast efforts to assure that SB 375 can be implemented, complying with its statutory protections for a healthy economy and growing population.

BizFed will help SCAG with the above solutions to truly connect all Southern Californians.

Sincerely,



Sandy Sanchez  
BizFed Chair  
FivePoint



David Fleming  
BizFed Founding Chair



Tracy Hernandez  
BizFed Founding CEO  
IMPOWER, Inc.

## BizFed Association Members

Action Apartment Association  
Alhambra Chamber of Commerce  
American Beverage Association  
American Hotel & Lodging Association  
American Institute of Architects – Los Angeles  
Angeles Emeralds  
Apartment Association, California Southern Cities  
Apartment Association of Greater Los Angeles  
Arcadia Association of REALTORS  
AREAA North Los Angeles SFV SCV  
Asian Business Association  
Association of Club Executives  
Association of Independent Commercial Producers  
Azusa Chamber of Commerce  
Bell Gardens Chamber of Commerce  
Beverly Hills Bar Association  
Beverly Hills Chamber of Commerce  
BNI 4SUCCESS  
Boyle Heights Chamber of Commerce  
Building Industry Association, LA / Ventura  
Building Industry Association, Baldyview  
Building Owners & Managers Association, Greater LA  
Burbank Association of REALTORS  
Burbank Chamber of Commerce  
Business & Industry Council for Emergency Planning & Preparedness  
Business Resource Group  
CalAsian Chamber  
CalCFA  
California Apartment Association, Los Angeles  
California Asphalt Pavement Association  
California Association of Food Banks  
California Bankers Association  
California Bus Association  
California Business Roundtable  
California Cannabis Industry Association  
California Construction and Industry Materials Association  
California Contract Cities Association  
California Fashion Association  
California Gaming Association  
California Grocers Association  
California Hispanic Chamber of Commerce  
California Hotel & Lodging Association  
California Independent Oil Marketers Association  
California Independent Petroleum Association  
California Life Sciences Association  
California Manufacturers & Technology Association  
California Metals Coalition  
California Restaurant Association  
California Retailers Association  
California Small Business Alliance  
California Society of CPAs -Los Angeles Chapter  
California Sportfishing League  
California Trucking Association  
Carson Chamber of Commerce  
Carson Dominguez Employers Alliance  
CDC Small Business Finance  
Central City Association  
Century City Chamber of Commerce  
Cerritos Regional Chamber of Commerce  
Citrus Valley Association of REALTORS  
Commercial Industrial Council/Chamber of Commerce  
Construction Industry Air Quality Coalition  
Construction Industry Coalition on Water Quality  
Council on Trade and Investment for

Filipino Americans  
Covina Chamber of Commerce  
Culver City Chamber of Commerce  
Downey Association of REALTORS  
Downey Chamber of Commerce  
Downtown Long Beach Alliance  
El Monte/South El Monte Chamber  
El Segundo Chamber of Commerce  
Employers Group  
Engineering Contractor's Association  
EXP  
F.A.S.T. - Fixing Angelenos Stuck In Traffic  
FilmLA  
Friends of Hollywood Central Park  
Fur Information Council of America  
FuturePorts  
Gardena Valley Chamber of Commerce  
Gateway to LA  
Glendale Association of REALTORS  
Glendale Chamber of Commerce  
Glendora Chamber of Commerce  
Greater Antelope Valley Association of REALTORS  
Greater Lakewood Chamber of Commerce  
Greater Los Angeles African American Chamber  
Greater Los Angeles Association of REALTORS  
Greater Los Angeles New Car Dealers Association  
Harbor Trucking Association  
Historic Core Business Improvement District  
Hollywood Chamber of Commerce  
Hollywood Property Owners Alliance  
Hong Kong Trade Development Council  
Hospital Association of Southern California  
Hotel Association of Los Angeles  
Huntington Park Area Chamber of Commerce  
Independent Cities Association  
Industry Manufacturers Council  
Inglewood Airport Area Chamber of Commerce  
Inland Empire Economic Partnership  
International Warehouse Logistics Association  
Irwindale Chamber of Commerce  
La Cañada Flintridge Chamber of Commerce  
L.A. County Medical Association  
L.A. Fashion District BID  
L.A. South Chamber of Commerce  
Larchmont Boulevard Association  
Latino Food Industry Association  
LAX Coastal Area Chamber of Commerce  
League of California Cities  
Long Beach Area Chamber of Commerce  
Los Angeles Area Chamber of Commerce  
Los Angeles County Board of Real Estate  
Los Angeles County Waste Management Association  
Los Angeles Gateway Chamber of Commerce  
Los Angeles Gay and Lesbian Chamber of Commerce  
Los Angeles Latino Chamber of Commerce  
Los Angeles Parking Association  
Maple Business Council  
Motion Picture Association of America  
MoveLA a Project of Community  
NAIOP Southern California Chapter  
National Association of Royalty Owners  
National Association of Tobacco Outlets  
National Association of Women Business Owners  
National Association of Women Business Owners – Los Angeles

National Hispanic Medical Association  
National Latina Business Women  
Orange County Business Council  
Pacific Merchant Shipping Association  
Pacific Palisades Chamber of Commerce  
Panorama City Chamber of Commerce  
Paramount Chamber of Commerce  
Pasadena Chamber of Commerce  
Pasadena-Foothills Association of Realtors  
PhRMA  
Planned Parenthood Southern Affiliates of California  
Pomona Chamber of Commerce  
Propel L.A.  
Rancho Southeast Association of REALTORS  
Recording Industry Association of America  
Regional Black Chamber - San Fernando Valley  
Regional Chamber of Commerce-San Gabriel Valley  
Rosemead Chamber of Commerce  
San Dimas Chamber of Commerce  
San Gabriel Chamber of Commerce  
San Gabriel Valley Economic Partnership  
San Pedro Peninsula Chamber of Commerce  
Santa Clarita Valley Chamber of Commerce  
Santa Clarita Valley Economic Development Corp.  
Santa Monica Chamber of Commerce  
Sherman Oaks Chamber of Commerce  
South Bay Association of Chambers  
South Bay Association of REALTORS  
South Gate Chamber of Commerce  
Southern California Contractors Association  
Southern California Golf Association  
Southern California Grant Makers  
Southern California Leadership Council  
Southern California Minority Suppliers Development Council Inc. +  
Southern California Water Coalition  
Southland Regional Association of REALTORS  
Sunland-Tujunga Chamber of Commerce  
The Young Professionals at the Petroleum Club  
Torrance Area Chamber  
Town Hall Los Angeles  
Tri-Counties Association of REALTORS  
United Chambers San Fernando Valley & Region  
United States-Mexico Chamber  
Unmanned Autonomous Vehicle Systems Association  
US Resiliency Council  
Valley Economic Alliance  
Valley Industry & Commerce Association  
Vernon Chamber of Commerce  
Vietnamese American Chamber of Commerce  
Warner Center Association  
West Hollywood Chamber of Commerce  
West Los Angeles Chamber of Commerce  
West San Gabriel Valley Association of REALTORS  
West Valley/Warner Center Association Chamber  
Western Manufactured Housing Association  
Western States Petroleum Association  
Westside Council of Chambers  
Westwood Community Council  
Westwood Village Rotary Club  
Whittier Chamber of Commerce  
Wilmington Chamber of Commerce  
World Trade Center Los Angeles  
Young Professionals in Energy - LA Chapter







January 24, 2020

*Sent via email and USPS*

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**Re: Draft Program Environmental Impact Report for Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (State Clearing House Number 2019011061)**

Dear Mr. Ok:

These comments are submitted on behalf of the Center for Biological Diversity (the “Center”) regarding the Draft Program Environmental Impact Report (“DEIR”) for Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“RTP/SCS”). The Center has reviewed the DEIR and RTP/SCS and provides these comments for consideration by the Southern California Association of Governments (SCAG).

The Center is encouraged to see several conservation facets of the RTP/SCS, including SCAG’s attention to preserve, enhance, and restore regional wildlife connectivity (RTP/SCS at 50), avoid growth in wetlands, wildlife corridors, biodiverse areas, wildfire prone areas and floodplains (RTP/SCS at 55), encourage housing and commercial development near public transit and urban areas (RTP/SCS at 48) and incorporate greenbelts into planning initiatives (RTP/SCS at 55). The Center respectfully submits these comments to help achieve SCAG’s aspirations of a “healthier, safer, more resilient and economically vibrant region” by facilitating a comprehensive approach to growth that addresses human transportation and development needs, the needs of wildlife and habitats that are fragmented by transportation infrastructure and development, and how we can make human and natural communities more resilient to climate change.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center and its members have worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Southern California.

## I. The Connect SoCal Goals Should Include Maintaining and Enhancing Wildlife Movement and Habitat Connectivity

The Center is encouraged to see the inclusion of Goal #10, “Promote conservation of natural and agricultural lands and restoration of critical habitats” (DEIR at ES-7); however, integrating wildlife connectivity is critical to overall ecosystem health and biodiversity. Doing so would also improve chances of attaining other goals, including supporting healthy and equitable communities, reducing greenhouse gas emissions and improving air quality, and adapting to climate change. Preserving and restoring habitat connectivity would help ensure invaluable ecosystem services that benefit human communities, including but not limited to water purification, erosion control, groundwater recharge, resilience to extreme weather events (e.g., severe storms and flooding), carbon sequestration, and crop pollination.

As mentioned in the Center’s Notice of Preparation comment letter, roads and traffic create barriers that lead to habitat loss and fragmentation, which harms wildlife and people. As barriers to wildlife movement and the cause of injuries and mortalities due to wildlife vehicle collisions, roads and traffic can affect an animal’s behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Mitsch and Wilson 1996; Trombulak and Frissell 2000; van der Ree et al. 2011; Haddad et al. 2015; Marsh and Jaeger 2015; Ceia-Hasse et al. 2018). For example, habitat fragmentation from roads and traffic has been shown to cause mortalities and harmful genetic isolation in mountain lions in southern California (Riley et al. 2006, 2014, Vickers et al. 2015), increase local extinction risk in amphibians and reptiles (Cushman 2006; Brehme et al. 2018), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López et al. 2010; Loss et al. 2014; Kantola et al. 2019), and alter pollinator behavior and degrade habitats (Trombulak and Frissell 2000; Goverde et al. 2002; Aguilar et al. 2008). Habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Damschen et al. 2019). The authors conclude that efforts to preserve and enhance connectivity will pay off over the long-term and “[conservation] plans that focus solely on habitat area, will leave unrealized the substantial, complementary, and persistent gains in biodiversity attributable specifically to landscape connectivity,” (Damschen et al. 2019).

The Center recommends the goal be edited as follows:

Goal #10: “Promote conservation of natural and agricultural lands **and habitat connectivity** and restoration of critical habitats **and wildlife movement corridors.**”

## II. The Connect SoCal Guiding Principles Should Include Maintaining and Enhancing Wildlife Movement and Habitat Connectivity to Protect Wildlife and Improve Public Safety

Wildlife vehicle collisions pose a major public safety and economic threat, as well as a threat to the region’s wildlife and biodiversity. During 2015 to 2018 more than 26,000 incidents involving vehicles and wildlife were reported to the California Highway Patrol, which included

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reports of animals standing next to, in, or running across lanes, collisions with large animals, or swerving to avoid collisions and resulting in a crash (Shilling et al. 2019). State reports and car insurance companies estimate that that 7,000 to 23,000 wildlife vehicle collisions (with large mammals) have occurred annually on California roads (Shilling et al. 2017; Shilling et al. 2018; Shilling et al. 2019; State Farm Insurance Company 2016, 2018). These crashes result in human loss of life, injuries, emotional trauma, and property damages that can add up to an estimated \$300-600 million per year and over \$1 billion from 2015-2018, based on reported wildlife vehicle collisions. And it is important to note that collisions with large animals often go unreported as much as 5- to 10-fold (Donaldson and Lafon 2008; Olson et al. 2014; Donaldson 2017) Thus, avoiding and minimizing impacts of transportation projects and development on wildlife movement and habitat connectivity would help preserve biodiversity and ecosystem health while protecting human health and safety.

The Guiding Principles should reflect the need to adequately address wildlife movement and habitat connectivity issues to minimize wildlife vehicle collisions. Outside of California many states, including Arizona, Colorado, Florida, Montana, Nevada, Oregon, New Mexico, Utah, Washington, and Wyoming, have been proactively addressing wildlife connectivity issues and realizing the benefits of wildlife crossing infrastructure. For example, Arizona, Colorado, and Wyoming have seen 80-96% reductions in wildlife vehicle collisions while gradually increasing the level of wildlife permeability over time (it appears that some species take more time than others to adapt to crossings) on sections of highways where they have implemented wildlife crossing infrastructure, such as underpasses, culverts, overpasses, wildlife fencing, and escape ramps (Dodd et al. 2012; Sawyer et al. 2012; Kintsch et al. 2018). Utah just completed the state's largest wildlife overpass at Parleys Canyon for moose, elk, and deer. Washington State is about to complete its largest wildlife overpass on I-90, which is anticipated to provide habitat connectivity for a wide variety of species between the North and South Cascade Mountains. The overpass cost \$6.2 million as part of a larger \$900 million expansion project that will include multiple wildlife crossings along a 15-mile stretch of highway. Savings from less hospital bills, damage costs, and road closures from fewer wildlife vehicle collisions will make up those costs in a few years (Valdes 2018). State transportation departments are actively pursuing these types of projects because of the benefits for wildlife connectivity, public safety, and the economy. California needs to follow suit and more actively invest in preserving habitat connectivity where there are no roads while also enhancing or restoring connectivity where roads or other transportation infrastructure already exist.

The Draft Plan recognizes two important ecological components about southern California. First, it recognizes the incomparable biological diversity of California, due primarily to its flora:

“The region’s desert, mountain and coastal habitats have some of the highest concentrations of native plant and animal species on the planet. Southern California is part of the California Floristic Province, one of the planet’s top twenty-five biodiversity hotspots.” (RTP/SCS at 23)

Secondly, it recognizes the significant contribution to greenhouse gas sequestration that plants, exposed soils and open space provide:

“In addition to their respective roles in biodiversity and food production, both natural areas and farmlands help reduce the impacts of climate change by capturing greenhouse gases in the soil, plants, and trees instead of allowing them to concentrate in the atmosphere.” (RTP/SCS at 36)

In addition, southern California native plants are adapted to our unique “Mediterranean” climate and persist in our relatively arid conditions where rainfall primarily occurs on the winter. For all of these reasons, the Draft Plan needs to adopt the commitment to the preferential use of native plants as part of the final 2020-2045 Regional Transportation/Sustainable Communities Plan.

Much literature is available on the use of native plants on roadsides. The Federal Highway Administration produced a Managers Guide to Roadside Revegetation Using Native Plants (FHA-DOT 2007), which notes:

“Native plants are a foundation of ecological health and function. Revegetating roadsides with native plants is a key practice for managing environmental impacts and improving conditions for healthy ecosystems. The ability to establish native plant communities on roadsides is central to determining whether the transportation corridor will be a healthy environment or a damaged one.”

The Guide continues to tout the benefits of using native plants along transportation corridors as follows:

“Native plants along roadsides offer ecological, economic, safety, and aesthetic advantages. Ecologically, healthy native plant communities often are the best long-term defense against invasive and noxious weeds. Economically, maintenance costs for managing problematic vegetation are reduced, as are the concerns that sometimes result when weeds from roadsides invade neighboring lands or when pollution from herbicides occurs.”

From the perspective of safety, the FHA states:

“The establishment of native plant communities supports transportation safety goals in a number of ways. One of the most important is by improving the function of roadside engineering. Appropriate vegetation can enhance visibility and support design features to help drivers recover if their vehicles leave the pavement. When native plant materials are incorporated into road design, they can improve long-term slope stability while softening visual experiences.”

Native roadside vegetation helps to identify local place, reduces the cost of roadside maintenance, and requires little to no pesticides (Quarles 2003). Tinsley et al (2007) found that native revegetation grass and forb seed mixes outperformed non-native seed mixes in establishing cover on roadsides and concluded that “suites of early- and late-successional native species can provide a highly effective mix for revegetation projects”. In order to assure successful planting with native plant species, care must be taken when planning native roadside

plantings. Plant selection must consider soil type and compaction from engineered slopes, harsh microclimates directly adjacent to roads, invasive species, and pollution from vehicle emissions. Haan et al. (2012) found that “soil characteristics largely determined plant survival” but other considerations were also important considerations. Karim and Mallik (2007) found that “floristic zonation along roadsides is a function of roadside microtopography, substrate type and environmental gradients created by the road building process” and that certain native plant species were more successful in certain zones. Therefore, careful selection of native species is crucial to successfully vegetating transportation corridors. Fortunately, California’s diverse native flora provides the diversity to meet the roadside zones. Several drought tolerant native species lists, tailored to local conditions are readily available for the South Bay of Los Angeles County<sup>1</sup> and coastal southern California<sup>2</sup>.

Because of the ongoing pollinator crisis, the Draft Plan also needs to adopt the commitment to use best management practices for pollinators as part of the final 2020-2045 Regional Transportation/Sustainable Communities Plan. The Federal Highways Administration (FHA-DOT 2015) provides guidelines for best management practices that will benefit pollinators and includes a focus on using native plants. Wildlife connectivity typically focuses on large animals that require safe passage through and beyond their home territories and because of that scale, automatically protects a suite of more localized plants and animals. Here, linear roadside corridors are obviously inappropriate for large mammals, but can still be important and indeed crucial to plants and small animals, including invertebrates. Therefore, these types of linear features should not be overlooked for their potential ecological benefits.

While some of the SCAG transportation goals include roads and road improvements in urbanized areas, these areas provide great opportunities to transition plantings to native plants that are drought tolerant, sequester carbon, provide linear habitat for local fauna and identify a sense of place based on southern California’s iconic flora. For these reasons and those listed above, the Draft Plan would benefit from the incorporation of a commitment to the preferential use of native plants as part of the final 2020-2045 Regional Transportation/Sustainable Communities Plan.

Therefore, the Center recommends Connect SoCal Guiding Principles to be edited as follows:

Guiding Principle #2: Place high priority for transportation funding in the region on projects and programs that improve **human** mobility, accessibility, reliability and safety, and **wildlife connectivity that is based on native southern California flora**. ~~that preserve the existing transportation system~~

Guiding Principle #5: Encourage transportation investments that will result in improved air quality and public health **and safety**, and reduced greenhouse gas emissions

<sup>1</sup> See <https://bestofthesouthbay.com/10-drought-tolerant-california-native-plants/>

<sup>2</sup> See <https://www.scpr.org/news/2015/05/13/51644/go-native-a-list-of-drought-friendly-california-pl/>

### III. The Projects on the Transportation System Project List Undercut the SCAG's Stated Land Use Strategies and Sustainability Goals

The Center is encouraged to see that SCAG's land use strategies include prioritizing infill and redevelopment; facilitating multimodal transportation for various purposes (*i.e.*, work, education, other destinations); urban greening; and avoiding growth in wetlands, wildlife corridors, biodiverse areas, wildfire prone areas, and floodplains. However, the Transportation Project List contains over 300 pages of projects in Appendix 2.0, many of which include the widening and extension of freeways, which will result in increased greenhouse gas ("GHG") emissions and fragment landscapes and wildlife connectivity while promoting sprawl development, some of which is located in high fire hazard severity zones.

As the Center noted in its NOP comments to SCAG last year, scientific studies and state agency reports from the California Air Resources Board ("CARB") have shown the state will not achieve the necessary GHG emissions reductions to meet its mandates for 2030 and 2050 without significant changes to how communities and transportation systems are planned, funded and built. Significant reductions in GHG emissions is the only pathway to limiting the impacts of climate crisis, which are already being felt by people and wildlife throughout the state. Those reductions will not be achieved by small half measures of simply encouraging more zero-emission vehicles or hoping local agencies will change their land use decision-making in the future. Instead agencies at all levels—state, regional and local—must take head on the interconnected relationship between the climate crisis and land use, housing, workforce growth and transportation investments. Fundamental changes in land use planning for the future by local and regional land use agencies and hard questions about existing transportation plans must occur.

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For example, the Transportation Project List earmarks an astounding \$600,000,000 for the 138 Northwest Corridor Improvement Project to support leapfrog sprawl development like Tejon Ranch Company's proposed Centennial city. Centennial would be located 60 miles away from a major work center (*i.e.*, downtown Los Angeles) so the Project's anticipated 57,000 residents will be forced to drive long distances to reach jobs, schools, and supplies for decades during Project build-out. Centennial alone would generate 75,000 new vehicle trips per day, with an average trip length of 45 miles. The development will also pave over pristine native grasslands rich with endemic and rare species in a mountain lion movement corridor important for statewide genetic connectivity and an area designated as having very high fire hazard severity.

In addition to the 138 Northwest Corridor Improvement Project, there are many projects that involve paving over dirt roads, which could lead to increased traffic that would result in increased greenhouse gas emissions from increasing VMT and significant impact on small animal species since roads with heavy traffic may deter movement from a wide range of small animals (Brehme et al. 2013; Brehme et al. 2018). Transportation projects should focus more on public transit infrastructure and less on widening already large freeways and paving dirt roads, both of which facilitate the use of more cars and increase vehicle miles traveled, commute times, air pollution, and greenhouse gas emissions.

The Transportation Project List allocates many millions of dollars on I-15 expansion projects even while the I-15 continues to be a major barrier to mountain lion and wildlife

movement, and critical wildlife crossings along the I-15 remain unfunded. Instead of further degrading habitat connectivity by expending hundreds of millions of dollars on multi-lane highways in remote areas that will fill up with GHG emitting vehicles, SCAG should prioritize funding for more public transit and adequate wildlife crossings on existing highways. For instance, critical wildlife crossings such as the Liberty Canyon Wildlife Crossing are not yet fully funded. In fact, in the 300-page project list, there is only a *single* listed proposal for a wildlife crossing.

As it stands, the RTP/SCS contains laudable goals regarding sustainable development, reducing VMT, and increasing wildlife connectivity. However, many of the projects on the Transportation Project List will undercut these goals by increasing VMT and exacerbating existing connectivity problems. If SCAG is serious about addressing this region-wide issue, it should work to reallocate funding away from particularly damaging projects and instead allocate funding towards public transit and wildlife connectivity projects.

#### **IV. SCAG Should Aim for Higher Per Capita VMT Reductions**

The Center is encouraged by SCAG's goals and guiding principles that focus on supporting more development supported by existing public transit. (RTP/SCS at 8.) However, the Center believes SCAG can and should do more to reduce daily vehicles miles traveled. Increases in VMT negatively impact communities by leading to more vehicle crashes, poorer air quality, increases in chronic diseases associated with reduced physical activity, and worse mental health. Also, as noted above, the natural environment is impacted as higher VMT leads to more collisions with wildlife and fragments habitat. Therefore, any additional step SCAG takes to reduce VMT will have co-benefits of better air quality, decreased chronic disease, decreased wildlife-vehicle collisions, and less habitat fragmentation.

As currently drafted, the RTP/SCS boasts of a 4.1% reduction in VMT per capita from a 2045 baseline and a 9.5% reduction from the base year of 2016. (RTP/SCS at 5, 122.) However, these reductions are far less than reductions in VMT detailed in the December 2018 Technical Advisory issued by the Governor's Office of Planning and Research ("OPR VMT Report"). The OPR VMT Report concluded, "achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals." (OPR VMT Report at 12.) OPR emphasized that land use decisions to reduce GHG emissions associated with the transportation sector are crucial to meet the state's GHG reductions goals. (*Id.* at 3.) The OPR VMT Report further noted that because California cannot meet its climate goals without curbing single-occupancy vehicle activity, land use patterns and transportation options will need to change to support reductions in VMT. (*Id.* at 10.) Historically regional SCS and RTPs have lead increases in VMT rather than decreasing them as SB 375 intended. While SCAG's RTP/SCS has taken a small step in the right direction, it is not enough, and more fundamental changes are needed. The Center urges SCAG to utilize the RTP/SCS process to set the region on the path reducing its VMT at the level necessary to address the climate crisis and meet the state's GHG reduction goals.

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## V. The DEIR Fails to Adequately Assess or Mitigate Impacts to Mountain Lions (*Puma concolor*) and Regional Wildlife Connectivity Throughout the SCAG Region

The Center is encouraged to see SCAG acknowledge the importance of wildlife corridors and habitat connectivity by including the preservation, enhancement, and restoration of regional wildlife connectivity (RTP/SCS at 50), avoiding growth in wetlands, wildlife corridors, biodiverse areas, wildfire prone areas and floodplains (RTP/SCS at 55), and drawing attention to greenbelts (RTP/SCS at 55). Mountain lions are a key indicator species of wildlife connectivity. As the last remaining wide-ranging top predator in the region, the ability to move through large swaths of interconnected habitat is vital for genetic connectivity and their long-term survival. In addition, impacts to mountain lions in the SCAG region could have severe ecological consequences; loss of the keystone species would have ripple effects on other plant and animal species, potentially leading to a decrease in biodiversity and diminished overall ecosystem function. Without mountain lions, increased deer populations can overgraze vegetation and cause stream banks to erode (Ripple and Beschta 2006; Ripple and Beschta 2008). Many scavengers, including foxes, raptors, and numerous insects, would lose a reliable food source (Ruth and Elbroch 2014; Barry et al. 2019). Fish, birds, amphibians, reptiles, rare native plants, and butterflies would diminish if this apex predator were lost (Ripple and Beschta 2006; Ripple and Beschta 2008; Ripple et al. 2014).

In light of recent studies regarding imperiled mountain lion populations in Southern California, the DEIR fails to disclose or describe the RTP/SCS's severe impacts on mountain lion populations throughout the SCAG region. CEQA requires a "mandatory finding of significance" if there is substantial evidence in the record that the Project *may* cause a "wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species . . . ." (CEQA Guidelines § 15065(a)(1).) This means that a project is deemed to have a significant impact on the environment as a matter of law if it reduces the habitat of a species, or reduces the number or range of an endangered, rare, or threatened species.<sup>3</sup> (See *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 792 fn. 12 [citing *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1273–1274].)

There is ample scientific evidence that indicates mountain lion populations in Southern California are imperiled and that human activities and land use planning that does not integrate adequate habitat connectivity can have adverse impacts on mountain lions. Continued habitat loss and fragmentation has led to 10 genetically isolated populations within California. Several populations in Southern California are facing an extinction vortex due to high levels of inbreeding, low genetic diversity, and high human-caused mortality rates from car strikes on roads, depredation kills, rodenticide poisoning, poaching, disease, and increased human-caused wildfires (Ernest et al. 2003; Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015; Benson et al. 2016; Gustafson et al. 2018; Benson et al. 2019). This is detailed in the Center's petition to

<sup>3</sup> On June 25, 2019, the Center and Mountain Lion Foundation submitted a petition pursuant to 14 Cal. Code Regs. § 670.1 to the California Fish and Game Commission requesting the Commission list the Santa Ana mountain lion population and other populations as "endangered" or "threatened" under the California Endangered Species Act.



the California Fish and Game Commission to protect Southern California and Central Coast mountain lions under the California Endangered Species Act (Yap et al. 2019).

Mountain lions in the Santa Monica Mountains and Santa Ana Mountains were found to have dangerously low genetic diversity and effective population size, and they are likely to become extinct within 50 years if gene flow with other mountain lion populations is not improved (Benson et al. 2016; Gustafson et al. 2018; Benson et al. 2019). Due to extreme isolation caused by roads and development, the Santa Monica and Santa Ana mountains populations exhibit high levels of inbreeding, and, with the exception of the endangered Florida panther, have the lowest genetic diversity observed for the species globally (Ernest et al. 2014; Riley et al. 2014; Gustafson et al. 2018; Benson et al. 2019). In addition, Gustafson et al. (2018) found that the nearby mountain lion population in the San Gabriel/San Bernardino Mountains also has low genetic diversity and effective population size, which indicates that they too have a high risk of extinction. The long-term survival of these mountain lions, along with those in the Tehachapi and Sierra Pelona mountains, are vital for statewide genetic connectivity (Gustafson et al. 2018). Improved connectivity among the mountain lion populations within the SCAG Region and beyond is essential for the long-term survival of Southern California mountain lion populations (Gustafson et al. 2017; Gustafson et al. 2018; Benson et al. 2019).

Growth and development in identified “major highway projects” (RTP/SCS at Exhibit 3.2), “transit priority areas” (RTP/SCS at Exhibit 3.7), “priority growth area - high quality transit areas” (RTP/SCS at Exhibit 3.8), and “livable corridors” (RTP/SCS at 3.10) could have severe impacts on Southern California’s already-imperiled mountain lion populations. Such development without addressing wildlife connectivity issues and integrating effective wildlife crossings and corridors could lead to the extirpation of multiple mountain lion populations in the SCAG region. The RTP/SCS should encourage the involvement of wildlife connectivity experts from CDFW and other agencies, organizations, academic institutions, communities, and local groups starting at the initial planning stage of development and transportation projects so that habitat connectivity can be strategically integrated into project design and appropriately considered in the project budget. The RTP/SCS should require highway projects to include adequate wildlife crossing infrastructure in order to reduce impacts to mountain lions and other species.

Project planning should consider the impacts of climate change on wildlife movement and habitat connectivity in the design and implementation of projects and any mitigation. Climate change is increasing stress on species and ecosystems, causing changes in distribution, phenology, physiology, vital rates, genetics, ecosystem structure and processes, and increasing species extinction risk (Warren et al. 2011). A 2016 analysis found that climate-related local extinctions are already widespread and have occurred in hundreds of species, including almost half of the 976 species surveyed (Wiens 2016). A separate study estimated that nearly half of terrestrial non-flying threatened mammals and nearly one-quarter of threatened birds may have already been negatively impacted by climate change in at least part of their distribution (Pacifi et al. 2017). A 2016 meta-analysis reported that climate change is already impacting 82 percent of key ecological processes that form the foundation of healthy ecosystems and on which humans depend for basic needs (Scheffers et al. 2016). Genes are changing, species' physiology and physical features such as body size are changing, species are moving to try to keep pace with

suitable climate space, species are shifting their timing of breeding and migration, and entire ecosystems are under stress (Parmesan and Yohe 2003; Root et al. 2003; Parmesan 2006; Chen et al. 2011; Maclean and Wilson 2011; Warren et al. 2011; Cahill et al. 2012).

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**VI. Conclusion**

Thank you for the opportunity to submit comments on the DEIR and RTP/SCS for Connect SoCal. We look forward to working with SCAG to foster land use policy and growth patterns that promote wildlife movement and habitat connectivity, facilitate public health and safety, and move towards the State’s climate change goals. Please do not hesitate to contact the Center with any questions at the number or email listed below.

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Sincerely,



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## References

(provided on CD via USPS)

- Aguilar, R., Quesada, M., Ashworth, L., Herrerias-Diego, Y., & Lobo, J. (2008). Genetic consequences of habitat fragmentation in plant populations: Susceptible signals in plant traits and methodological approaches. *Molecular Ecology*, *17*, 5177–5188.
- Barry, J. M., Elbroch, L. M., Aiello-lammens, M. E., Sarno, R. J., Seelye, L., Kusler, A., & Quigley, H. B. (2019). Pumas as ecosystem engineers: ungulate carcasses support beetle assemblages in the Greater Yellowstone Ecosystem. *Oecologia*, (189), 577–586.
- Benítez-López, A., Alkemade, R., & Verweij, P. A. (2010). The impacts of roads and other infrastructure on mammal and bird populations: A meta-analysis. *Biological Conservation*, *143*, 1307–1316.
- Benson, J. F., Mahoney, P. J., Sikich, J. A., Serieys, L. E. K., Pollinger, J. P., Ernest, H. B., & Riley, S. P. D. (2016). Interactions between demography, genetics, and landscape connectivity increase extinction probability for a small population of large carnivores in a major metropolitan area. *Proceedings of the Royal Society B: Biological Sciences*, *283*(1837), 20160957.
- Benson, J. F., Mahoney, P. J., Vickers, T. W., Sikich, J. A., Beier, P., Riley, S. P. D., ... Boyce, W. M. (2019). Extinction vortex dynamics of top predators isolated by urbanization. *Ecological Applications*, *0*(0), e01868. \
- Brehme, C. S., Hathaway, S. A., & Fisher, R. N. (2018). An objective road risk assessment method for multiple species: ranking 166 reptiles and amphibians in California. *Landscape Ecology*, *33*, 911–935.
- Brehme, C. S., Tracey, J. A., Clenaghan, L. R. M. C., & Fisher, R. N. (2013). Permeability of roads to movement of scrubland lizards and small mammals. *Conservation Biology*, *27*(4), 710–720.
- Cahill, A. E., Aiello-Lammens, M. E., Fisher-Reid, M. C., Hua, X., Karanewsky, C. J., Ryu, H. Y., ... Wiens, J. J. (2012). How does climate change cause extinction? *Proceedings of the Royal Society B: Biological Sciences*, *280*, 20121890.
- Ceia-Hasse, A., Navarro, L. M., Borda-de-Água, L., & Pereira, H. M. (2018). Population persistence in landscapes fragmented by roads: Disentangling isolation, mortality, and the effect of dispersal. *Ecological Modelling*, *375*, 45–53.
- Chen, I.-C., Hill, J. K., Ohlemüller, R., Roy, D. B., & Thomas, C. D. (2011). Rapid range shifts of species associated with high levels of climate warming. *Science*, *333*, 1024–1026. \
- Cushman, S. A. (2006). Effects of habitat loss and fragmentation on amphibians: A review and prospectus. *Biological Conservation*, *128*, 231–240.
- Damschen, E. I., Brudvig, L. A., Burt, M. A., Jr, R. J. F., Haddad, N. M., Levey, D. J., ... Tewksbury, J. J. (2019). Ongoing accumulation of plant diversity through habitat connectivity in an 18-year experiment. *Science*, *365*(6460), 1478–1480.
- Dodd, N. L., Gagnon, J. W., Boe, S., Ogren, K., & Schweinsburg, R. E. (2012). *Wildlife-Vehicle Collision Mitigation for Safer Wildlife Movement Across Highways: State Route 260*.
- Donaldson, B. M. (2017). *Improving Animal-Vehicle Collision Data for the Strategic Application of Mitigation*.
- Donaldson, B. M., & Lafon, N. W. (2008). *Testing an Integrated PDA-GPS System To Collect*

*Standardized Animal Carcass Removal Data on Virginia Roadways.*

- Ernest, H. B., Boyce, W. M., Bleich, V. C., May, B., Stiver, S. J., & Torres, S. G. (2003). Genetic structure of mountain lion (*Puma concolor*) populations in California. *Conservation Genetics*, (4), 353–366.
- Ernest, H. B., Vickers, T. W., Morrison, S. A., Buchalski, M. R., & Boyce, W. M. (2014). Fractured genetic connectivity threatens a Southern California puma (*Puma concolor*) population. *PLoS ONE*, 9(10).
- Federal Highways Administration, Department of Transportation (FHA-DOT) (2007). A Manager's Guide to Roadside Revegetation Using Native Plants. Pgs.28 <https://www.fs.fed.us/wildlifecrossings/library/documents/MangersGuidetoRoadsideRevegetationUsingNativePlants.pdf>
- (2015). Roadside Best Management Practices that Benefit Pollinators: Handbook for Supporting Pollinators through Roadside Maintenance and Landscape Design. Pgs. 94 [https://www.environment.fhwa.dot.gov/env\\_topics/ecosystems/Pollinators\\_Roadsides/BMPs\\_pollinators\\_landscapes.aspx](https://www.environment.fhwa.dot.gov/env_topics/ecosystems/Pollinators_Roadsides/BMPs_pollinators_landscapes.aspx)
- Goverde, M., Schweizer, K., Baur, B., & Erhardt, A. (2002). Small-scale habitat fragmentation effects on pollinator behaviour: Experimental evidence from the bumblebee *Bombus veteranus* on calcareous grasslands. *Biological Conservation*, 104, 293–299.
- Gustafson, K. D., Gagne, R. B., Vickers, T. W., Riley, S. P. D., Wilmers, C. C., Bleich, V. C., ... Ernest, H. B. (2018). Genetic source–sink dynamics among naturally structured and anthropogenically fragmented puma populations. *Conservation Genetics*, 20(2), 215–227.
- Gustafson, K. D., Vickers, T. W., Boyce, W. M., & Ernest, H. B. (2017). A single migrant enhances the genetic diversity of an inbred puma population. *Royal Society Open Science*, 4(5).
- Haddad, N. M., Brudvig, L. A., Clobert, J., Davies, K. F., Gonzalez, A., Holt, R. D., ... Townshend, J. R. (2015). Habitat fragmentation and its lasting impact on Earth's ecosystems. *Science Advances*, 1(e1500052), 1–9.
- Haan, N.L., MC. R. Hunter and M.D. Hunter. 2012. Investigating Predictors of Plant Establishment During Roadside Restoration. *Restoration Ecology* 20 (3):315–321. <https://deepblue.lib.umich.edu/bitstream/handle/2027.42/91190/j.1526-100X.2011.00802.x.pdf?sequence=1&isAllowed=y>
- Kantola, T., Tracy, J. L., Baum, K. A., Quinn, M. A., & Coulson, R. N. (2019). Spatial risk assessment of eastern monarch butterfly road mortality during autumn migration within the southern corridor. *Biological Conservation*, 231(December 2018), 150–160.
- Karim M.N. and A.U. Mallik. 2008. Roadside revegetation by native plants. I. Roadside microhabitats, floristic zonation and species traits. *Ecological Engineering* 32: 222–237. <http://flash.lakeheadu.ca/~amallik/publication%20pdf/2008/Karim%20and%20Mallik%202008.pdf>
- Kintsch, J., Cramer, P., Singer, P., Cowardin, M., & Phelan, J. (2018). *State Highway 9 Wildlife Crossings Monitoring - Year 2 Progress Report*.
- Loss, S. R., Will, T., & Marra, P. P. (2014). Estimation of bird-vehicle collision mortality on U.S. roads. *Journal of Wildlife Management*, 78, 763–771.
- Maclean, I. M. D., & Wilson, R. J. (2011). Recent ecological responses to climate change support predictions of high extinction risk. *Proceedings of the National Academy of Sciences*, 108(30), 12337–12342.
- Marsh, D. M., & Jaeger, J. A. G. (2015). Direct effects of roads on small animal populations. In

- Roads and ecological infrastructure: Concepts and applications for small animals* (pp. 42–56).
- Mitsch, W. J., & Wilson, R. F. (1996). Improving the success of wetland creation and restoration with know-how, time, and self-design. *Ecological Applications*, 6(1), 16–17.
- Olson, D. D., Bissonette, J. A., Cramer, P. C., Green, A. D., Davis, S. T., Jackson, P. J., & Coster, D. C. (2014). Monitoring wildlife-vehicle collisions in the Information Age: How smartphones can improve data collection. *PLoS ONE*, 9(3), e98613.
- Office of Planning and Research. (2018). Technical Advisory: On Evaluating Transportation Impacts in CEQA, [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)
- Pacifici, M., Visconti, P., Butchart, S. H. M., Watson, J. E. M., Cassola, F. M., & Rondinini, C. (2017). Species' traits influenced their response to recent climate change. *Nature Climate Change*, 7(3), 205–208.
- Parmesan, C. (2006). Ecological and Evolutionary Responses to Recent Climate Change. *Annual Review of Ecology, Evolution, and Systematics*, 37, 637–669.
- Parmesan, C., & Yohe, G. (2003). A globally coherent fingerprint of climate change impacts across natural systems. *Nature*, 421(2), 37–42.
- Quarles, W. 2003. Native Plants and Integrated Roadside Vegetation Management. *IPM Practitioner* 25(3/4):1-9 <https://www.birc.org/MarApril2003.pdf>
- Riley, S. P. D., Serieys, L. E. K., Pollinger, J. P., Sikich, J. A., Dalbeck, L., Wayne, R. K., & Ernest, H. B. (2014). Individual behaviors dominate the dynamics of an urban mountain lion population isolated by roads. *Current Biology*, 24(17), 1989–1994.
- Ripple, W. J., & Beschta, R. L. (2006). Linking a cougar decline , trophic cascade , and catastrophic regime shift in Zion National Park. *Biological Conservation*, 133, 397–408.
- Ripple, W. J., & Beschta, R. L. (2008). Trophic cascades involving cougar, mule deer, and black oaks in Yosemite National Park. *Biological Conservation*, 141, 1249–1256.
- Ripple, W. J., Estes, J. A., Beschta, R. L., Wilmers, C. C., Ritchie, E. G., Hebblewhite, M., ... Wirsing, A. J. (2014). Status and ecological effects of the world 's largest carnivores. *Science*, 343(6167), 1241484.
- Root, T. L., Price, J. T., Hall, K. R., Schneider, S. H., Resenzweig, C., & Pounds, J. A. (2003). Fingerprints of global warming on wild animals and plants. *Nature*, 421, 57–60.
- Ruth, T. K., & Elbroch, L. M. (2014). The carcass chronicles : carnivory, nutrient flow, and biodiversity. *Wild Felid Monitor*, 14–19.
- Sawyer, H., Lebeau, C., & Hart, T. (2012). Mitigating roadway impacts to migratory mule deer - a case study with underpasses and continuous fencing. *Wildlife Society Bulletin*, 36(3), 492–498.
- Scheffers, B. R., De Meester, L., Bridge, T. C. L., Hoffmann, A. A., Pandolfi, J. M., Corlett, R. T., ... Watson, J. E. M. (2016). The broad footprint of climate change from genes to biomes to people. *Science*, 354(6313).
- Shilling, F. M., Denney, C., Waetjen, D., Harrold, K., Farman, P., & Perez, P. (2018). *Impact of Wildlife-Vehicle Conflict on California Drivers and Animals*.
- Shilling, F. M., Waetjen, D. P., & Harrold, K. (2017). *Impact of Wildlife-Vehicle Conflict on California Drivers and Animals*.
- Shilling, F., Waetjen, D., Harrold, K., & Farman, P. (2019). *2019 Impact of Wildlife-Vehicle Conflict on California Drivers and Animals*.
- Tinsley, M. J., M.T. Simmons, S. Windhager. 2007. The Establishment Success of native Versus Non-Native Herbaceous Seed Mixes on a Revegetated Roadside in Central Texas. *ICOET*

2007 Proceedings. Chapter 5: 220-228.

<https://pdfs.semanticscholar.org/bf74/aaa5e1ebde819063b89b819adacd0bc7e288.pdf>

- Trombulak, S. C., & Frissell, C. A. (2000). Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology*, *14*(1), 18–30.
- Valdes, M. (2018, December 12). Washington state builds bridge to keep wildlife off highway. *Associated Press*.
- van der Ree, R., Jaeger, J. A. G., van der Grift, E. A., & Clevenger, A. P. (2011). Effects of roads and traffic on wildlife populations and landscape function: Road ecology is moving toward larger scales. *Ecology and Society*, *16*(1), 48.
- Vickers, T. W., Sanchez, J. N., Johnson, C. K., Morrison, S. A., Botta, R., Smith, T., ... Boyce, W. M. (2015). Survival and mortality of pumas (*Puma concolor*) in a fragmented, urbanizing landscape. *PLoS ONE*, *10*(7), 1–18.
- Warren, R., Price, J., Fischlin, A., de la Nava Santos, S., & Midgley, G. (2011). Increasing impacts of climate change upon ecosystems with increasing global mean temperature rise. *Climatic Change*, *106*(2), 141–177.
- Wiens, J. J. (2016). Climate-related local extinctions are already widespread among plant and animal species. *PLoS Biology*, *14*(12), 1–18.
- Yap, T. A., Rose, J. P., & Cummings, B. (2019). *A Petition to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened under the California Endangered Species Act (CESA)*.



Sponsors:

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Transportation Corridor Agencies

Contributing Partner:

Orange County Local Agency Formation Commission

January 22, 2020

Mr. Roland Ok  
 Southern California Association of Governments  
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[2020PEIR@scag.ca.gov/ok@scag.ca.gov](mailto:2020PEIR@scag.ca.gov/ok@scag.ca.gov)  
 Uploaded via: <https://www.connectsocial.org/Pages/Draft-2020-PEIR-Comment-System.aspx>

**SUBJECT: DRAFT 2020 RTP/SCS "CONNECT SOCIAL" PEIR COMMENTS**

Dear Mr. Ok:

The Center for Demographic Research has reviewed the Draft 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS, "Connect SoCal") PEIR. We recognize and appreciate the work SCAG staff has done to produce these reports and work with local agencies during the development process and for the continued cooperation and reception of initial feedback and draft comments discussion.

1

We also want to extend our thanks for the close coordination between SCAG and the Center for Demographic Research (CDR) at California State University, Fullerton on behalf of Orange County jurisdictions to ensure that the 2020 RTP/SCS and PEIR preferred alternative's growth forecast accurately reflects all entitlements, development agreements, projects recently completed, and projects under construction.

The CDR would like to express support of comments and recommendations on the Draft 2020 RTP/SCS PEIR by the Orange County Council of Governments, the Orange County Transportation Authority, and other Orange County agencies whose comments support Connect SoCal with its use of the Orange County's growth forecast, the 2018 Orange County Projections. We thank you for the opportunity and ask for your consideration and response to the following comments detailed comments in Table 1 below. If you have any questions, please do not hesitate to contact me at [ddiep@fullerton.edu](mailto:ddiep@fullerton.edu) or 657-278-4596.

2

Sincerely,

Deborah S. Diep  
 Director, Center for Demographic Research

EMAIL CC: CDR Management Oversight Committee  
 CDR Technical Advisory Committee  
 Ruby Zaman, CDR

**Table 1. PEIR COMMENTS**

#	TOPIC	PAGE	RTP NARRATIVE, COMMENT & RECOMMENDATION
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#	TOPIC	PAGE	RTP NARRATIVE, COMMENT & RECOMMENDATION	
1	Define	Glossary, all pages	The PEIR only includes a glossary of acronyms. Please define the following terms and add to the glossary: Orientation timing, p. 1.0-13 Development centers Livable corridors p. 3.11-43 Neighborhood mobility areas p. 3.11-43 Urban infill p. 3.11-45 Compact/walkable (communities) p. 3.11-45 Destinations, p. 3.14-21 Mobility options, p. 3.14-21 Large-lot single-family, p. 3.14-23 Small-lot single-family, p. 3.14-23 ROW, p. 3.14-25	3
2	General Comment	All tables and figures	All tables and figures should cite original source data and not reference previous SCAG RTP documents.	4
3	General Comment	All data, tables and figures	All references to data that is interpolated, e.g., interpolating 2019 estimates from 2016-2020 or 2016-2045 growth increments, should be annotated as such. Each column/row in tables, as applicable, should be annotated to indicate if data was interpolated.	5
4	Clarification	ES-8, paragraph 2	“The region’s transportation network comprises more than 9,000 miles of public transit, 5,000 miles of bikeways, 135,578 lane miles of roadways, and 94 miles of express lanes.” Please clarify if ‘lane miles’ include highways and freeways.	6
5	Clarification	ES-9, paragraph 2	“There are many contributors to the overall housing shortfall, such as <u>state regulations</u> , zoning, costs and fees that prevent projects from... Additionally, population and employment growth in metropolitan areas in California has slowed in recent years, <u>in part</u> , because wages cannot compensate for the high cost of housing.”	7
6	Clarification	ES-9, paragraph 3	“Since the Plan <u>envisions</u> <del>foresees</del> regional growth with transportation system improvements, it identifies strategies to ...”	8
7	Clarification	ES-10, bullet 3	“Establish a mileage-based user fee <u>to replace the gas tax and to</u> generate a funding source for aging infrastructure and construction of other travel options”	9
8	Clarification	Table ES-5 p. 2.0-26	“PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	10
9	Clarification	Table ES-5 p. 2.0-27	“PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	11
10	Clarification	Table ES-5 p. 2.0-29	“PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	12



#	TOPIC	PAGE	RTP NARRATIVE, COMMENT & RECOMMENDATION	
11	Clarification	Table ES-5 p. 2.0-30	“PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	13
12	Clarification	Table ES-5 p. 2.0-32	“PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency.”	14
13	Clarification	Table ES-5 p. 2.0-33	“PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	15
14	Clarification	Table ES-5 p. 2.0-34	“PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	16
15	Clarification	Table ES-5 p. 2.0-36	“PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	17
16	Clarification	Table ES-5 p. 2.0-37	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	18
17	Clarification	Table ES-5 p. 2.0-39	“PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	19
18	Clarification	Table ES-5 p. 2.0-39	“PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	20
19	Clarification	Table ES-5 p. 2.0-57	“PMM-NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	21

#	TOPIC	PAGE	RTP NARRATIVE, COMMENT & RECOMMENDATION	
20	Clarification	Table ES-5 p. 2.0-64	“PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	22
21	Clarification	Table ES-5 p. 2.0-66	“PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the Lead Agency:”	23
22	Clarification	1.0-4, paragraph 3	“... Responsible for regional policy direction and review, standing committees at SCAG include the Executive/Administration Committee, the Transportation Committee, the Community, Economic & Human Development Committee, the Energy & Environmental Committee, and Legislative/Communication & Membership Committee. In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees...” All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.	24
23	Clarification	1.0-12, paragraph 2	“...For purposes of the PEIR, 2019 data has been estimated based on an interpolation of 2016 to 2045 projections. Available data that differs from this generalized explanation and used to determine existing conditions is specified in each resource section in Section 3.0 of this document.” All references to data that is interpolated, e.g., interpolating 2019 estimates from 2016-2020 or 2016-2045 growth increments, should be annotated as such. Please provide more information in the document, appendix or separate memo regarding how data was interpolated if various methods and sources were used.	25
24	Define	1.0-13, paragraph 3	“...However, because locations, densities, orientation timing, and...” Define ‘orientation timing’	26
25	Clarification	1.0-13, paragraph 3	“Intensified Land Use Alternative ... This alternative analyzes more aggressive densities and land use patterns than included in the Accelerated Tomorrow Scenario... It also includes a greater progressive job-housing distribution optimized for TODs and infill in HQTAs.” Explain ‘Accelerated Tomorrow Scenario’ and ‘greater progressive job-housing distribution’.	27
26	Clarification	3.11-3, paragraph 5	“Regional Housing Needs Assessment (RHNA): <del>Regional Housing Needs Assessment</del> — <u>Legislatively-mandated state program that quantifies</u> <del>Quantifies</del> the need for housing within each jurisdiction of the SCAG region based on population growth projections. <del>Jurisdictions</del> <u>Communities</u> then address this need through the process of <u>updating</u> <del>completing</del> the housing elements of their General Plans.”	28
27	Correction	3.11-5, paragraph 4	“...El Centro Naval Air Facility, Fort Irwin, <u>Joint Forces Training Base-Los Alamitos</u> , Los Angeles Air Force Base...”	29
28	Clarification	3.11-11, paragraph 4	“...In addition to the standing committees, there are various subcommittees, technical advisory committees, working groups, and task forces that report to the standing committees...” All these subcommittees do not report directly to the policy/standing committees. Please clarify the hierarchy of which committees/groups report to whom, e.g., working groups to staff, RHNA subcommittee to CEHD, etc., by listing all the committees and who they report to.	30

#	TOPIC	PAGE	RTP NARRATIVE, COMMENT & RECOMMENDATION	
29	Clarification	3.11-12, paragraph 1	<p><del>“City and county general plans must be consistent with each other.”</del> This statement is not accurate. Delete.</p>	31
30	Clarification	3.11-15, paragraph 5	<p><u>“Multi-Family Residential (Attached units)</u> The term ‘multi-family units’ is used to describe those housing units that <u>Multi-family units</u> are attached residences. This includes apartments, condominiums, and townhouses, <u>even if townhomes are typically categorized as single-family units.</u> SCAG refers to housing in the RTP &amp; PEIR as single-family and multi-family, while in practice, SCAG classifies units into two categories: single-family detached and all other units, which is generically referred to as ‘multi-family’.</p>	32
31	Clarification	3.11-20, paragraph 2	<p>“...In yet other instances, lands may be designated or zoned as open space <u>or as agriculture</u> but still allow for development of a single-family home.”</p>	33
32	Clarification	3.11-22, paragraph 2	<p>“Each local jurisdictional authority (city or county) with lands within the coastal zone is required to develop...” Include how far inland is considered to be in the coastal zone.</p>	34
33	Clarification	3.11-32, paragraph 1	<p>“Regional Housing Needs Assessment ...The California Department of Housing and Community Development (HCD), in consultation with each council of governments, determines each region’s existing and projected housing need.<sup>35</sup> HCD must meet and consult with each council of governments, including SCAG, regarding the assumptions and methodology to be used by HCD to determine the region’s housing need.<sup>36</sup> HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans.<sup>37</sup> <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>	35
34	Clarification	3.11-32, paragraph 4	<p>“The purpose of the housing element is to identify the community’s housing needs, <u>as determined by the RHNA process</u>, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs.”</p>	36
35	Clarification	3.11-33, paragraph 3	<p>“...If the total regional population forecasted and used in the regional transportation plan is within a range of three 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination...If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. <u>Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.”</u></p>	37

#	TOPIC	PAGE	RTP NARRATIVE, COMMENT & RECOMMENDATION	
36	Clarification	p. 3.11-43, paragraph 2	“...Land use strategies included in the Plan aim to <u>redistribute focus</u> most of the new housing and job growth into high-quality transit areas (HQTAs), with 60 percent of new homes and 73 percent of new jobs being located in these Priority Growth Areas (PGAs), which include existing main streets, downtowns, and commercial corridors. Land use strategies also seek to <u>concentrate focus</u> growth in other PGAs, such as...”	38
37	Clarification	p. 3.11-45, paragraph 2	“In addition, it is possible that many general plans do not include similar regional policies as they are focused on land uses within the local jurisdiction.” What are the regional policies referred to?	39
38	Clarification	p. 3.11-45, paragraph 2	“For example, while the Plan includes strategies for compact development and higher densities as a means to accommodate increased population in an efficient manner, many jurisdictions are planning for smaller individual numbers and may assume <u>smaller lower</u> densities.” What are ‘smaller individual numbers’?	40
39	Clarification	p. 3.11-45, paragraph 2	“It is possible that local general plans have not been updated to reflect the land use assumptions within the Plan, <u>because jurisdictions do not have to change their general plans to be consistent with the SCS</u> <del>despite SCAG’s outreach and bottom up planning process for the reasons stated above.</del> As a result, there exists the potential for <u>SCAG’s projected land use pattern to conflict with</u> a local general plan <del>to conflict with SCAG’s projected land use pattern.</del> ”	41
40	Clarification	p. 3.11-45, paragraph 4	“As previously discussed, there are areas subject to general plans that would be impacted by transportation projects.”  Are there areas not subject to general plans?	42
41	Clarification	3.14-1, paragraph 4	“Household: A household consists of all the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit, such as partners or roomers, is also counted as a household. <u>There is no more than one household per housing unit.</u> ”	43
42	Clarification	3.14-1, paragraph 6	“Housing: As used in this analysis, housing is data available from the U.S. Census for the SCAG region for the period of 2000 through 2035. Housing is a general term used to describe multiple housing units.” Clarify years of data used and add DOF as a source.	44
43	Clarification	3.14-1, paragraph 7	“Housing Unit: A house, an apartment or other group of rooms, or a single room are regarded as housing units when occupied or intended for occupancy as separate living quarters. Different jurisdictions have slightly different definitions of what constitutes a housing unit.” Explain why jurisdictions may have different housing unit definitions.	45
44	Clarification	3.14-2, paragraph 3	“The six-county SCAG region encompasses 38,000 square miles in area (almost 25 million acres) and is home to approximately 19 million people as of 2019, making it the second most populous metropolitan region in the U.S. <sup>1</sup> <sup>1</sup> American FactFinder. 2017. <i>2017 Population Estimates</i> . Latest data available for the U.S. is for 2018. Please update text and citation.	46
45	Clarification	3.14-3, Table 3.14-1	Correct source citations to U.S. Census Bureau Decennial Census 2000 and 2010. Cite original source of 2019 data as DOF or SCAG’s interpolated data as appropriate. SCAG Local Profiles contain 2018 data from DOF and 2017 from Census ACS due to the timing of publication of document and prior release of source data.	47

#	TOPIC	PAGE	RTP NARRATIVE, COMMENT & RECOMMENDATION	
46	Clarification	3.14-4, top sentence	At a fundamental level, there is simply not enough housing for everyone who wants to live in the state <u>in the type of housing unit they can afford in the jurisdiction they prefer.</u>	48
47	Clarification	3.14-4, Table 3.14-2	Correct source citations to U.S. Census Bureau Decennial Census 2010 and 2019 data as DOF or SCAG’s interpolated data as appropriate.	49
48	Clarification	3.14-4, paragraph 3 Household Income	Data reported is from 2017 ACS and for whole counties, not just the incorporated cities within each county. Update text accordingly. Correct data to 2018 American Community Survey data and cite accordingly.	50
49	Clarification	3.14-4 & 5, paragraph 4 Household Size; Table 3.14-3	Data reported is from State DOF. Cite original data source, not SCAG past documents. Update data to most recent E-5 DOF 2019 estimates for all jurisdictions, not just incorporated cities.	51
50	Clarification	3.14-6, Table 3.14-4	Verify data and cite original data source, not SCAG past documents.	52
51	Clarification	3.14-7, Tables 3.14-5 & 6	Verify data and cite original data source, not SCAG past documents. Data is likely from State EDD if for wage & salary only. If these estimates are for total employment, including both wage & salary and self-employment, state this in a table note. If 2019 data is interpolated, indicate this in notes.	53
52	Clarification	3.14-8, Table 3.14-7	Verify data and cite original data source, not SCAG past documents. Source is likely State EDD for 2000.	54
53	Clarification	3.14-8 & 9	“...the following guiding principles approved by SCAG’s Regional Council on August 1, 2019.” RC agenda did not have these as an action item. Update guiding principles to current.	55
54	Clarification	3.14-13, paragraph 3	“Regional Housing Needs Assessment ... HCD’s determination is based on population projected produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans. <sup>15</sup> <u>SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than 1.5 percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by the Department of Finance. Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections.</u> ”	56
55	Clarification	3.14-20, paragraph 6	“...SCAG holds growth projection numbers constant at the <u>jurisdiction</u> , county and regional level, meaning that as the distribution of population, housing and employment changes, the total numbers remain constant.”	57
56	Clarification	3.14-23, paragraph 3	“...Specifically, improved accessibility and connectivity potentially gained from transportation investments in the Plan could facilitate population and economic growth in areas of the region that are currently not developed or <u>are underdeveloped and in areas not currently planned for the type of density the Plan proposes.</u> ”	58

#	TOPIC	PAGE	RTP NARRATIVE, COMMENT & RECOMMENDATION
57	Clarification	3.14-27, paragraph 2	“...The Plan includes land use strategies that would <del>redistribute</del> <u>target</u> the region’s growth in the next 25 years into HQTAs, urban areas, and more walkable, mixed-use communities. Supported by other public amenities and transit services, housing in these areas tends to <del>cost more</del> <u>command higher</u> <del>premiums</del> and may be attractive to more affluent residents and unaffordable <del>for</del> <u>to</u> current residents in these areas.”

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Innovate. Advocate. Achieve. Together.

January 24, 2020

Draft Connect SoCal PEIS Comments
Attn: Roland Ok
Southern California Association of Governments
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

Re: PEIS – Chapter 3.8 on Greenhouse Gases

Dear Mr. Ok:

Climate Resolve is pleased to submit the following comments on the Draft Connect SoCal PEIS.

Overall, there are many excellent sections within the draft. However, we wish, below, to provide both general and detailed comments to make the PEIS more contemporary and more relevant to the SCAG region.

1

Among the larger issues, we believe it insufficient and unhelpful to still use 2012 GHG emission data in 2020. We suggest that SCAG blend-in CARB data to present a more contemporary picture on emissions, specifically, the region’s sharp rise in transportation emissions.

2

Another major weakness is the sub-chapter on public health. We think it needs a lot of work, and have made suggestions below on where to find relevant data.

3

In its table of member municipalities, SCAG may wish to add an assessment of compliance with SB 379, SB 1000 and LHMPs. Climate Resolve has this data for each and every municipality within the SCAG region and would be happy to share.

4

Last, SCAG needs to state up-front the State of California’s current position on GHG reductions – namely that EO B-55-18 commits the state to carbon neutrality by 2045. The Newsom Administration is continuing the Brown Administration’s approach – and we see no reason to believe that this policy will be the operational policy of the state going forward.

5

On specific content within the chapter:

Page 3.8-1:

- Paragraph 2:
o “Nitrous Oxide NO2” change to “N2O”
• Paragraph 3:

6

- o "... atmosphere are thought to be linked" should be change to "are linked".  
"Thought to be linked" sounds equivocal, as if scientists remain uncertain. The science is clear, and SCAG should state it as such.

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Page 3.8-2:

- Change Nitrous Oxide abbreviation to "N2O"

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Page 3.8-3:

- Change Nitrous Oxide abbreviation to "N2O"

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Page 3.8-5:

- Paragraph 1:
  - o The caveating language about the range of climate impacts is absurd and needs to be changed. There is no serious debate on whether GHGs "have caused" or "will cause" climate change. The leading uncertainty concerns the rate of GHG emissions, not whether science can accurately predict impacts.
  - o Therefore, we suggest that SCAG remove the word "significant" in "there continues to be significant debate over the extent..."
  - o And remove the caveating language whether GHG has caused or "will cause" climate change?.
- Paragraph 2:
  - o Add "longwave" to "GHGs are any gas that absorbs **longwave** radiation in the atmosphere"
  - o We noticed a curious absence of referring to peer-reviewed climate studies that cover the SCAG region, especially Cal-Adapt, as well as the State of California Fourth Climate Change Assessment and two regional studies covering the Los Angeles Region and Inland South, see <http://climateassessment.ca.gov/> and <https://cal-adapt.org/>.

10

Page 3.8-6:

- We noticed the authors using global data on glacier loss, we suggest that SCAG also cite California specific glacier loss information from the 2018 OEHHA climate indicators report: <https://oehha.ca.gov/climate-change/document/indicators-climate-change-california>; and cite the same report for migration of species (aka refugia).
- For reference 10, on snowmelt rates, we noticed that SCAG uses an old 2006 datapoint. We suggest updating your data by citing either the California 4th Climate Change Assessment or Schwartz, Hall, et al "Significant and Inevitable End-of-Twenty-First-Century Advances in Surface Runoff Timing in California's Sierra Nevada" from 2017, <https://journals.ametsoc.org/doi/pdf/10.1175/JHM-D-16-0257.1>.

11

Page 3.8-8:

- Paragraph 1: change "from" to "by" in "this would further exacerbate hazard posed from dead trees.
- Paragraph 2: please reference the groundbreaking wildfire study by Jin, Randerson, Hall, et al as it focuses on the Southern California / SCAG Region: "Identification of two distinct fire

12



regimes in Southern California: implications for economic impact and future change,” <https://iopscience.iop.org/article/10.1088/1748-9326/10/9/094005>

- Paragraph 3: in the SCAG region is the US’s leading research institution on acidification and hypoxia, the Southern California Coastal Water Research Project, located in Costa Mesa. In fact, SCCWRP’s director co-chairs the West Coast Ocean Acidification & Hypoxia Science Panel. We suggest referencing their reports: <http://westcoastoah.org/westcoastpanel/>.

12

**Page 3.8-9:**

- Paragraph 1: It is curious why SCAG does not cite regionally-specific studies related to flood events. The Bureau of Reclamation has produced three studies that generally cover the SCAG territory. The LA Basin Study, <https://www.usbr.gov/lc/socal/basinstudies/LABasin.html>, the Santa Ana Watershed Basin Study: <https://www.usbr.gov/lc/socal/basinstudies/OWOW.html>, and the Southeast California Regional Basin Study: <https://www.usbr.gov/lc/socal/basinstudies/SECA.html>. We suggest referencing these important locally-focused studies.

13

**Page 3.8-11:**

- First and preceding paragraph and Table 3.8-2: The text and table showing China’s current lead in GHG emissions is curiously both accurate and misleading. It is misleading in that a single year does not yield the full view of GHG emissions. (How to calculate GHG emissions is one of the most contentious issues at the United Nations.) We believe it is only fair to also include data and charts/graphs associated with cumulative GHG emissions. The World Resources Institute — a source used by SCAG in other sections — suggests that from 1850-2011 the United States and Western Europe have together contributed over 50% of global GHG emissions. See <https://www.wri.org/blog/2014/11/6-graphs-explain-world-s-top-10-emitters>. We see it as important to view GHG emissions both ways — describing present day data as well as cumulative emissions. Related idea, SCAG may wish to further analyze China’s GHG emissions, as well as other developing countries’ emissions, related to embedded carbon, especially those materials being produced for export to developed nations — which could be as high as 25% of all emissions; see National Academy of Sciences: <https://www.pnas.org/content/early/2010/02/23/0906974107.abstract>.

14

**Page 3.8-12 and 3.8-13:**

- Table 3.8-3: Please explain why SCAG is not using California Air Resources Board inventory data in the table. It would be helpful to show discrepancies between IPCC assumptions and CARB data, especially important because CARB demonstrates that California’s transportation emissions are higher than what IPCC suggests.

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**Page 3.8-14:**

- Paragraph 2: It is insufficient and unhelpful to still use 2012 data in 2020. We suggest SCAG use statewide CARB data to present a more contemporary picture on emissions, specifically, the region’s sharp rise in transportation emissions.

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**Page 3.8-15:**

- Has SCAG evaluated black carbon contributions to local GHG emissions? This is especially important as there has been a steep rise in port activity since 2012, which also suggests an

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increase in diesel use along with associated black carbon emissions. Please consult with South Coast AQMD.

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**Page 3.8-16:**

- The public health section is paltry and insufficient. The section needs to be greatly enhanced. SCAG may reference any number of relevant studies ranging from CALBRACE reports, <https://www.cdph.ca.gov/Programs/OHE/Pages/CalBRACE.aspx>, especially those created for individual counties: <https://www.cdph.ca.gov/Programs/OHE/Pages/ClimateHealthProfileReports.aspx>. There is also the County of Los Angeles OurCounty sustainability plan, the California 4th Climate Change Assessment, especially its CHAT tool (which can be used for determining heat impacts on human health): <https://www.cal-heat.org/>
- End of page, second to last bullet: please edit to add “no carbon” option to “low carbon” as well.

18

**Page 3.8-17:**

- Add to bullets: “transitioning from use of flurochlorines in industry”
- The seven strategies recommended are paltry and insufficient. There are easily hundreds of interesting relevant strategies that SCAG member cities and COGs could deploy. We strongly suggest adding at least 15 more adaptation strategies. (In our view, SCAG should also highlight social resilience or social cohesion, as a key strategy. Cool streets and parking lots should also be highlighted — as should investment in resilience hubs and enhancing emergency management communications.) A quick survey of Safeguarding California will provide additional strategies. See <http://resources.ca.gov/docs/climate/safeguarding/update2018/safeguarding-california-plan-2018-update.pdf>
- Last Paragraph: add Local Hazard Mitigation Plans (LHMPs) to “these actions take the form of climate action plans, general plan policies, **Local Hazard Mitigation Plans (LHMPs)**, GHG reduction plans, sustainability plans, and ordinances.”

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**Page 3.8-27:**

- **3.8.2.3 State**
  - Add discussion on LHMPs, SB379, SB1035, and SB1000

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**Page 3.8-49:**

- **Cities:** add COGs Climate Action / Climate Adaptation Plans
  - (e.g., South Bay Cities’ 2019 COG Climate Adaptation Plan [http://southbaycities.org/sites/default/files/documents/FinalSubRegionalAdaptationPlan\\_Sep\\_2019.pdf](http://southbaycities.org/sites/default/files/documents/FinalSubRegionalAdaptationPlan_Sep_2019.pdf))

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**Page 3.8-51:**

- Table 3.8-4:
  - The City of Lakewood has not adopted a Climate Action Plan, please change.
  - Most of these links are to the municipalities’ website **and not individual plan**
    - Suggestion: Hyperlink to each plan where adopted

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- Include separate columns for GHG reduction policies and climate change adaptation strategies in general plans, to get a better sense of how well their General Plan addresses climate change. There are columns "Adaptation or Resilience Plan", but some cities choose to detail their adaptation plans within their General Plan.
- SCAG may wish to add an assessment of compliance with SB 379, SB 1000 and LHMPs. Climate Resolve has this data for each and every municipality within the SCAG region and would be happy to share.

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**Page 3.8-63:**

- For both tables, "NO2" change to "N2O"

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If you have any questions related to our comments on the PEIS, please do not hesitate to

Sincerely,



Jonathan Parfrey  
Executive Director

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p.s. I also wish to thank Kristopher Eclarino (Climate Resolve Fellow) for his contributions to the letter.



Daniel Burruel – Keep Nuevo Rural

All opened space, conservation areas should be connected creating a corridor for wildlife. For example, the El Potrero and the San Jacinto Wildlife Area must link together without any interruption of mass development, freeways, and so on, in between these open spaces. Green belts should run straight through cities; green threads of open spaces that run directly through the city of Perris, for example, must be promoted and adopted as models of open spaced systems to help promote a healthy community/city (Clive Greenbelt in Illinois, for example). The proposed project of warehouse development should be halted and open spaces, for example, in the rural, unincorporated community of Nuevo, and south of Ramona Expressway, along the banks of the San Jacinto River, should remain a vast open space. If SCAG is truly committed to embracing and advancing healthy communities, then proposed plans, such as SP 239 (Stoneridge Commerce Center), then proposed plans like this one should be completely abandoned. Thank you.



# UNITEHERE! Local 11

464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

January 24, 2020

**VIA EMAIL:** [2020PEIR@scag.ca.gov](mailto:2020PEIR@scag.ca.gov)

Roland Ok  
Southern California Association of Governments  
900 Wilshire Blvd., 16<sup>th</sup> Floor  
Los Angeles, CA 90017

**RE: COMMENTS ON DRAFT PEIR 2020 SCAG RTP/SCS (SCH # 20199011061)**

Dear Mr. Ok:

UNITE HERE Local 11 hereby provides these comments on the draft Program Environmental Impact Report ("PEIR") for the draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy plan ("Plan" or "2020 RTP/SCS"), by the Southern California Association of Governments ("SCAG") under the California Environmental Quality Act, Pub. Res. Code § 21000 *et seq.* ("CEQA").

Local 11 represents more than 25,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Phoenix, Arizona. Members of Local 11, including hundreds who live or work in the SCAG region, join together to fight for improved living standards and working conditions. Local 11's members have a direct interest in seeing that the State's environmental/planning laws are being followed and that new development and regional planning efforts do not contribute to the climate-change crisis that threatens a loveable future in Southern California for them and their children.

Here, one of the fundamental objectives of the 2020 RTP/SCS and PEIR is to provide specific strategies, policies, performance standards, and other provisions that will reduce greenhouse gas ("GHG") emissions pursuant to Senate Bill 375 ("SB 375"). To this end, Local 11 provides the following questions and requests for information about the Plan's specific GHG strategies that need to be included in a recirculated or final PEIR.

- A. Under the Plan, GHG per capita emissions from automobile and light-duty vehicles ("LDA") are anticipated to drop from 23.8 lbs/day (2005) to 21.3 lbs/day in 2020, and further reduced to 18.8 lbs/day in 2035 (see PEIR, Tbl. 3.8-10). Please clarify the following:

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- 1. How were these targets developed, what data was used, and what are the exact underlying calculations? What are the specific data and targets for each city and county within the SCAG region? 3
- 2. Are these targets for all project types or specific project types (e.g., residential, office, retail, hotel, mixed-use, etc.)? 4
- 3. Is the *capita* merely residents, residents + employees, or something else? 5
- 4. What is the trajectory of these GHG reductions over the duration of the Plan? Are there specific targets during the interim years between 2020-2035, or merely a straight-line negative compound annual growth rate? 6
- 5. Why are 2005 baseline emissions calculated based on EMFAC2007, but 2020 and 2035 levels based on EMFAC2014? 7
  
- B. Under the Plan, per capita Vehicles Miles Traveled (“VMT”) from LDAs and all vehicles are to be reduced from 22.09 VMT and 23.79 in 2009 (respectively) to 20.67 and 22.89 in 2045 (respectively) (see PEIR, Tbl. 3.8-11). Please clarify the following: 8
  - 1. How were these VMT targets developed, what data was used, and what were the exact calculations? What are the specific data and VMT targets for each city and county within the SCAG region? 9
  - 2. Are these VMT targets for all project types or specific project types (e.g., residential, office, retail, hotel, mixed-use, etc.)? 10
  - 3. What is the trajectory of these VMT reductions? Are there specific targets during the interim years between 2020-2035, or merely a straight-line negative compound annual growth rate? 11
  - 4. Clarify whether these VMTs are from just the residential population or also employees? 12
  - 5. What data/metrics are specific to employee trips? 13
  - 6. What are the VMT projections for the residential and employee populations, as well as the disaggregated data for the various cities and counties within the SCAG region? 13
  
- C. Under the Plan, various Plan goals are tied to key specific performance standards (see Plan, Performance Measures Report, Tbls. 1, 2, 4, 20). However, many of the standards are not made clear and require clarity, including: 14
  - 1. For Outcome 1(1) (id. pp. 15-16), what is the disaggregated data (e.g., what are the household/employment figures for each city and county within the SCAG region in 2016 and 2045 under both “Baseline scenario” and under the Plan scenario)? 14
  - 2. For Outcome 1(4) (id. p. 16), what is the disaggregated data (e.g., 2016 base year and Connect SoCal VMT levels for each city, and what is the interim targets between those years)?
  - 3. For Outcome 1(5) through (7) and Outcome 2 (1) through (6) (id. pp. 18-28), what is the disaggregated data (e.g., counties and cities), how were



these calculated/modeled, and how are projects able to demonstrate consistency with these performance metrics?

- 4. For all performance measures under Location Efficiency and Safety and Public Health (id. at pp. 56-58 [Tbl. 20]), what is the disaggregated data (e.g., counties and cities), how were these calculated/modeled, and how are projects able to demonstrate consistency with these performance metrics?

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- D. Under the Plan, four measures are listed as SCAG mitigation measures (e.g., SCAG “shall continue to work with” local agencies to adopt Climate Action Plans (“CAP(s)”), “shall encourage energy efficient design” through strengthening local building codes, “shall continue working with partners” to support deployment of electric vehicle (“EV”) charging stations, “shall continue to pursue partnerships” to promote energy-efficient development) (see PEIR, p. 3.8-68). Please clarify the following:

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- 1. What exactly do “work” or “encourage” or “working with” or “pursue” mean, and are these enforceable performance standards as CEQA requires?
- 2. What specifically is required to satisfy these vague mitigation measures?
- 3. What specific criteria can one objectively look at to determine compliance with these mitigation measures?
- 4. What specific performance-based criteria apply to these non-specific mitigation measures?
- 5. Why is there no consideration of specific actions listed (e.g., work with local agencies to develop CAPs that meet specific GHG reduction targets, or encourage local building code updates that require mandatory CalGreen Tier 1 or Tier 2 standards, or work with partners/agencies to support specific percentage of code-required parking to be EV-immediate charging, etc.)?
- 6. What other SCAG-related mitigation was considered and found infeasible?

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- E. Under the Plan’s Sustainable Communities Strategy Report, Appendix 1 (i.e., SPM Place Types), no mention is given as to hotel project types. Please explain how hotels are accounted for in the Plan, also the assumptions, intensification, traffic generation, GHG generation, and other relevant data specific to hotel uses/projects.

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Local 11 appreciates the opportunity to provide these comments to SCAG, and looks forward to a detailed response item by item with all requested supporting data. Please also provide us with all notices of CEQA actions or public hearings on the Plan/PEIR. Please send notice by e-mail to: [yzeltser@unitehere11.org](mailto:yzeltser@unitehere11.org).

23

Sincerely, 

Charles Du  
Staff Attorney, UNITE HERE Local 11





**SOUTHERN CALIFORNIA  
LEADERSHIP COUNCIL**



January 24, 2020

via U.S. Mail to:

Draft Connect SoCal Plan & PEIR Comments  
 Attn: Connect SoCal Team  
 Southern California Association of Governments  
 900 Wilshire Blvd., Ste. 1700  
 Los Angeles, CA 90017

and by electronic mail to: [2020PEIR@scag.ca.gov](mailto:2020PEIR@scag.ca.gov)

**Re: Comments on the the Draft “Connect SoCal” (SCAG’s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy) and the Related Draft Program Environmental Impact Report (PEIR).**

Ladies and Gentlemen:

On behalf of the Southern California Leadership Council (SCLC), the Building Industry Association of Southern California (BIASC) and the other business/industry associations subscribing to this letter, we appreciate this opportunity to comment on the Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“Connect SoCal”) and its associated Program Environmental Impact Report (draft “PEIR”). Our comments set forth below relate to both the draft policy document (i.e., the draft Connect SoCal) and the related

draft PEIR because our concerns about each are inextricably related. We therefore respectfully ask SCAG to consider our comments below in the context of both SCAG’s policy determinations and its compliance with the California Environmental Quality Act (“CEQA”), the discussion of which begins on page 12 hereof.

1

Our organizations, and the members and industries that they represent, have been involved with the implementation of Senate Bill 375 (2008) (hereinafter “SB 375”) ever since its original introduction. As Southern California stakeholders, we were also highly attentive to and involved in the formulation and adoption by the Southern California Association of Governments (“SCAG”) of its inaugural, 2012 regional transportation plan/sustainable communities strategy (“RTP/SCS”) and its more recent 2016 RTP/SCS. Indeed, we have been heavily involved with SCAG’s activities for the entire last decade.

The companies and individuals comprising our collective memberships care very deeply about economic development, job creation and the quality of life in Southern California. Many of our members engage in developing the housing, business properties and infrastructure (i.e. transportation, water, utilities, etc.) that are and will be needed to make the region the best possible place to live and work. Collectively, our organizations also include some of Southern California’s largest private employers. With that in mind, the comments set forth below about SCAG’s draft Connect SoCal and the related draft PEIR are based on our concern for the overall betterment of the SCAG region, its economy, its communities, and its citizens.

2

When we weighed in concerning SCAG’s 2012 RTP/SCS, its 2016 RTP/SCS, and recently in February 2019 concerning the scoping of the PEIR Connect SoCal, our group has consistently espoused principles concerning SCAG’s regional planning efforts; and we’ve always championed consistent policy outcomes. Even more recently, in September 2019, our coalition commented to SCAG concerning its then-proposed allocation of a preliminary sixth-cycle Regional Housing Needs Assessment (RHNA) for the SCAG region. When we did so, we recounted both the principles that we espouse and the societal and economic outcomes that we champion. We will also set them forth again below as they relate to the present context.

But before getting into such details, we will state here briefly our overall view of the draft Connect SoCal and its draft PEIR:

Insofar as the draft Connect SoCal relates to the distribution of new housing and purports to accommodate housing production, we believe that it takes large steps leading in the wrong direction. Our region is suffering from an urgent and worsening housing crisis, one which can be solved only through extraordinary increases in housing production and consequent improvements in housing affordability. Yet, if adopted as it is drafted, Connect SoCal will foreseeably combine with SCAG’s most recently vetted sixth-cycle RNHA allocation to channel the majority of the region’s future homebuilding overwhelmingly into already developed, densely urbanized areas. When combined, they largely aim for the near-total preclusion of other types of reasonable and appropriate community development (specifically suburban, annexed edge, greenfield and new town development). This is a dangerous policy prescription for any region that is suffering from a critical housing crisis, because it depends almost entirely on realizing – without precedent –

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massive production of the type of new housing that both is the hardest to produce and costs the most.

We recognize that SCAG's rationale for its heavy emphasis on infill is caused by increasingly imposing state mandates to reduce per capita VMT. However, we believe SCAG, when planning our region's future, must address and confront the need to balance VMT impacts against housing impacts both wisely and realistically. We believe that, unfortunately, SCAG's most recent proposals do not strike a wise and realistic balance of the kind that is needed now. Instead, if both the draft Connect SoCal and SCAG's recently-vetted RHNA distribution methodology were to be adopted as they are now proposed, they would combine to propel our region in the wrong direction vis-à-vis housing production and affordability. Given the severity of our region's housing crisis and the urgency of this moment, when SCAG's RTP/SCS and RHNA will converge to set a new course for land use throughout Southern California well into the future, it is imperative that we pause and get it right.

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Therefore, we respectfully urge SCAG to do what its southern brethren, the San Diego Association of Governments (SANDAG), did recently: seek and obtain permission to take an additional year in which to study and correct its overall regional planning. Our group would like to work with SCAG over the course of 2020 to fashion a much more realistic final Connect SoCal – one that will accommodate the entitlement of new housing units in such quantities, at such locations, and at such levels of affordability as will permit the housing of the SCAG region's population.

Lastly, we strongly urge SCAG to undertake preparation of an alternative planning scenario (APS) alongside a substantially revised and realistic sustainable communities strategy (SCS). As long as the California Air Resources Board (CARB) continues to impose unrealistically high targets for greenhouse gases (GHG) reductions which can be demonstrated only through radical cuts in per capita VMT, consequently worsening of our housing supply and affordability crises, SCAG should recognize and admit that such targets cannot possibly be met consistent with adopting a more realistic and appropriately accommodating SCS. The preparation of a complementary APS, therefore, one that reflects radical VMT reductions that CARB wants to see – however illusory they may ultimately prove to be, would allow SCAG to comply with its statutory requirements while simultaneously putting in place a much more realistic and beneficial RTP/SCS.

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As the draft Connect SoCal reads now, poised for its potential final adoption if not changed substantially, it will constitute a harmful policy document vis-à-vis housing supply and affordability at a time when the housing crisis indicates the need for a major course correction in policy. Consistent with this need, SCAG should recognize, grasp, and begin to champion urgently the need for changes in our state government's planning policies. Specifically, the current policies should be corrected so that SCAG's still-pending sixth-cycle RHNA allocation and its transportation planning do not continue driving the SCAG region down the road toward unduly centripetal development and re-development, with negative ramifications for housing supply and unaffordability. Accordingly, SCAG should lead regional planning toward a more balanced mix of both urban and peripheral development.

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DISCUSSION:

A. Our Group's Consistent Principles and Warnings Concerning SCAG's SCS Planning.

As is noted above, as our coalition has worked with SCAG's staff over the last decade, we have consistently espoused certain principles that we believe are essential to the effective and successful growth and development of the SCAG region. Last September, in connection with our comments concerning the then-proposed sixth-cycle RHNA allocation, we restated our support for sound regional planning that does all the following:

- Provides positive economic impacts and is a plan that is conducive to economic growth and job creation – Our organizations and our members are extremely aware of the economic implications of the spatial dispersion of homebuilding. When viewed at all scales (at the regional, the local, and the neighborhood levels), missteps and mistakes concerning how best to distribute land uses can profoundly impact economic vibrancy and stability. Specifically, the RTP/SCS must undergo a true economic cost/benefit analysis so that economic impacts are understood and known by SCAG Regional Council members (and stakeholders) before making a final decision on the RTP/SCS.
- Reasonably respects local governments' prerogatives – Policymakers need to respect the essential role of local government in sound land use decision-making, because local governments (much more than relatively central governments) have the best understanding of local needs, pressures, and aspirations of their growing and evolving communities. Maintaining local control of land use is essential to maintaining so-called “small d” democracy.
- Appreciates the organic nature of land use and development – Policymakers must appreciate the organic and dynamic nature of land development over time. Given this reality, land use planning must reflect continuous balancing and rebalancing of possible growth alternatives such as urban redevelopment and densification, and new town or greenfield development.
- Does not impose unrealistic, inflexible land use prescriptions on diverse jurisdictions – Our respective members constitute the businesses and individuals who know how to actually build new homes and communities. Accordingly, we see the many varying opportunities and challenges that are inherent in providing necessary housing throughout the SCAG region. Because of the widespread work that our members regularly undertake, we see the need for local governments to continue to entitle for new housing development or redevelopment on many diverse sites. Local governments must retain and exercise the necessary flexibility to take into account diverse local conditions of all types when making sound land use and entitlement decisions.
- Assures that new revenue sources are put in place to allow local governments to plan for achievable densification, while appreciating the beneficial primacy of market forces – Our

group has noted in other contexts (such as pertaining to SCAG's RTP/SCS development) that many of the desired changes in existing land uses are unlikely to occur unless there are put in place new and sufficient financial tools benefiting local government and public infrastructure. For example, in recent years, California dispensed with its erstwhile favorable urban redevelopment agency policies. Such helpful policies and tools must be restored and improved upon if local governments are required to spur positive community development and, especially, redevelopment.

- Anticipates and, where possible, overcomes legal and procedural roadblocks to housing construction – For years, our group has been calling for meaningful CEQA reform and other changes which would allow homebuilding to proceed more quickly when faced with NIMBYism and community resistance against change. In this environment, CEQA can be misused to halt progress toward housing goals. Sound regional planning, therefore, should meet all CEQA requirements and, more importantly, facilitate all related streamlining. Additionally, the state should adopt measures necessary to prevent the ongoing abuse of CEQA as a means to stop or significantly delay much needed and worthwhile housing projects.

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Whereas the principles set forth above are stated as positive characteristics, we have also shared our continuing views about the negative effects of some of the unhelpful policy directives that have been applied in California and the SCAG region. To a large extent, we remain sorely disappointed by the fact that there remain far too many regulatory and legal impediments to homebuilding. Several persistent regulatory trends are actually working against meaningful increases in housing production, and especially production at the scale needed to alleviate our state's housing crisis.

First, there is a strong, growing and thus ever-worsening regulatory preference for fostering transit-oriented, urban infill, and increasingly dense, multi-family development and redevelopment. While we certainly support reasonable efforts to increased production of higher density housing within the urban core, this particular housing type should be deployed in reasonable relative volume, in appropriate locations, and with a clear understanding and appreciation of the heightened costs that are associated with an excessive reliance on such dense, urban-infill housing types.

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With that in mind, we do not support an over-reliance on increased urban densification to the exclusion of more affordable, common and readily-available community types. The regulatory trend toward an over-emphasis on urban renewal and densification is particularly problematic from an affordability standpoint because the costs of building urban housing is often several times higher (on a square foot basis) than are the costs of other available and potential housing types – particularly less dense, suburban, and peripheral types of development, which are variously called relative “greenfield,” “new town,” “edge,” or “fringe” development.

Because the costs of developing and constructing dense urban housing is much higher than other types of homebuilding, fewer households can afford to buy or even to rent such new urban housing, at least not without significant government subsidies or housing assistance

programs. As a consequence, the still-growing regulatory preference for more intense urbanization, and the broad disfavoring of any and all greenfield development, are leading to sharp housing cost and price increases. These in turn exacerbate the under-supply of housing, and decrease both home ownership and regional living standards. These harmful trends should be especially alarming to those who are concerned about social equity and economic mobility – because home ownership has long provided a critical pathway for working class households to both secure housing and to accumulate family wealth and financial security.

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As noted, the excessive regulatory preference for urban densification and redevelopment has been accompanied by complementary regulations aimed at curbing homebuilding activities of all types that do not constitute high-density, urban, “transit-oriented” or so-called “centripital” (i.e., moving toward the center) development. The best example of this is the recently-imposed requirement to apply the California Environmental Quality Act (“CEQA”) to effectively tax and disincentivize vehicle miles traveled (“VMT”) – which is a costly attack on individual mobility alone, with profound implications for millions of prospective households. At a minimum, these new CEQA requirements related to VMT add further disincentives, costs, and hurdles to greenfield and new town development.

Concerning these new VMT mandates, everyone can agree on the need for efficient, smart, safe and well-functioning regional transportation solutions. Rather than focusing excessively on reducing VMT and individual vehicular mobility, however, new housing opportunities should be promoted, considered and pursued with proper attention to all of the following:

- (i) the relative costs of construction and infrastructure,
- (ii) the public demand for different housing types and at different prices (to accommodate social equity for working households),
- (iii) the relative costs of providing different housing types in different areas (e.g., urban versus greenfield or edge), and
- (iv) the complicated relationships among housing and job locations (e.g., achieving a jobs-housing balance sometimes requires putting more housing where jobs are, even when jobs are located outside of the urban core).

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Regrettably, the draft Connect SoCal very much perpetuates, incorporates and reflects the harmful policy push toward radical per capita VMT reductions. Again, we appreciate that SCAG feels compelled to do so in light of a state agency’s (CARB’s) mandate forcing SCAG to focus on VMT reductions as the primary means to demonstrate GHG reductions. In our view, however, the time has come for SCAG to take the lead in pushing back strongly against such state mandates, so that more realistic and ameliorative regional planning can then unfold. In doing so, SCAG should point out to state regulators that its decisions concerning the dispersion of new housing opportunities must take into account not only VMT, but also the real-life, existing, affordable, and dominant housing choices that are made by today’s regional workforce.



SCAG's ongoing failure to do so will have negative implications for social equity – especially for vulnerable communities. The lack of affordable and available housing in the Southern California region has played a role in exacerbating a number of serious problems such as homelessness, the disappearing middle class and the increasing outward migration from our region.

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Lastly, we have seen continuing increases in the costs of entitlement and construction. New and increasing fees and exactions continue to place a disproportionately large fiscal burden on homebuilding activities. Growing mandates for project developers and homebuilders to provide rental or ownership subsidies for the less advantaged, and/or homeless housing funding, will not achieve promised levels of housing production unless such mandates are accompanied by a suite of policies that will expedite entitlement approvals, reduce construction costs, and reduce other fees and exactions. Achieving the level of homebuilding activity necessary to address the current housing crisis will require the circumspect review of and substantial relief from the fiscal and regulatory cost burdens that impede the production of new housing.

In short, unless and until SCAG realizes that our region is mired in a worsening crisis concerning both the supply and affordability of new housing opportunities, SCAG will continue to pursue and implement unwise regional planning policies at the insistence of CARB. A substantial course correction is needed; and it should begin now. SCAG needs to take the lead in creating and pursuing such a course correction. If it were to fail to do so, our region will continue to be directed indefinitely toward a bleaker future and unnecessary, worsening crises in terms of both housing supply shortages and housing unaffordability.

In light of these concerns, we must note here and express our very strong disappointment concerning the SCAG Regional Council's decision to ignore and reject entirely our September 2019 comments concerning the then-proposed sixth-cycle RHNA allocation for the SCAG region. We set forth in those comments the need for SCAG to expand the areas over which new housing can and should be built to include more vacant land (for suburban, annexed edge, greenfield and new town development). Notably, as we stated in our September comments, we were not opposed to the overall large size of the proposed sixth-cycle RHNA, we were instead concerned about the allocations and ultimately the indicated locations of more than 1.34 million new housing units envisioned within the SCAG region.

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Specifically, our RNHA concern was and remains about where new housing units can best and most affordably be located and distributed amongst the nearly 200 local jurisdictions within the SCAG region. Housing has a higher likelihood of actually being built if the obligations to provide sufficient building sites for new housing are spread out in a more realistic, balanced and achievable manner. Because of this, we continue to urge SCAG to endeavor to allocate relatively more housing units toward the local jurisdictions that have a relatively meaningful supply of vacant land available.

Unfortunately, after we lodged our September 2019 comments concerning the RHNA allocation, SCAG chose to redirect the sixth-cycle RHNA allocation in the opposite direction from that which we advocated. Specifically, SCAG has since voted to squeeze even more of the

envisioned homesite allocations into the already urbanized, densely populated, and – importantly – least affordable relatively coastal communities. SCAG should not finalize the currently pending RHNA allocation without improvement; and SCAG most certainly should not hold the course that it is currently on for the entire sixth-cycle RHNA process (which is prescribed to last eight years).

Similarly, SCAG should be aiming now to adopt a 2020 RTP/SCS that reflects much more realistic assumptions about (i) where within the SCAG region there can be constructed nearly 1.5 million new housing units in the decade of the 2020's, and especially (ii) what will be the affordability of those units. Obviously, a substantial amount – but not all – of the needed additional housing stock can and should be provided as urban infill and through more urban densification. On the other hand, a very substantial portion of the needed additional housing stock will need to be instead in the form of so-called “new towns” and “edge” or “greenfield” development. **In short, a meaningful and significant portion of new housing units will need to be planned and built where there is now vacant land. Doing so will undoubtedly conflict with both (i) CARB’s ideal of significantly reducing per capita VMT in the region to unrealistically low levels, and (ii) the Connect SoCal plan as it is now proposed.**

This is not to say that SCAG’s staff and CARB should abandon their goal of planning for a sustainable region in which per capita *GHG-emissions reductions* can be realized. Moderate growth (i.e., relatively tempered growth) in per capita VMT is consistent with achieving the kinds of GHG-emissions reduction goals that climate-change scientists argue must be pursued – provided our society makes meaningful, steady improvements in our fleets and fuels over time. Steady improvements in both the efficiency of our transportation fleet and/or fuel options seem increasingly likely to unfold in the years ahead. Importantly, foreseeable improvements in our transportation fleet and fuel options will decrease the GHG-emissions reduction benefit that can be realized through any given decrease in per capita VMT – so much so that if we were to pursue enough of the former (fleet and/or fuel changes) and other technological advances, we would need none of the latter (per capita VMT reductions) to meet our GHG reduction goals.<sup>1</sup>

**B. The Draft Connect SoCal is Fundamentally Contrary to Our Group’s Longstanding Principles and Goals.**

<sup>1</sup> See K. Leotta & C. Burbank, *One Percent [Annual] VMT Growth or Less to Meet Greenhouse Gas Emissions Reduction Goals* (2009). Their study concludes that ambitious 2050 GHG emissions reduction goals can be achieved consistent with a moderated one percent annual increase in aggregate VMT – specifically if *emissions per VMT* can be decreased on average by roughly 72 percent over the 45-year projection period (2005-2050). Importantly, the combination of California’s standards requiring aggressive improvements in automobile emissions and the accelerating adoption of electric vehicles, natural gas, plug-in electric hybrid and even hydrogen vehicles suggests that California is well on its way to achieving greatly reduced GHG emissions per vehicle mile traveled. This foreseeable achievement will also predictably lessen over time the marginal benefit that will flow from any marginal reduction or constriction of per capita VMT.

In light of the above-stated principles and prior consistent urgings, we now encourage SCAG's staff to re-address and substantially correct the draft Connect SoCal and the related draft PEIR. Rather than adopt these drafts as they are, SCAG should refashion and adopt a 2020-2045 RTP/SCS that will allow for a realistic degree of ongoing per capita VMT growth in and about the SCAG region. To be sure, per capita VMT growth should be *tempered* and *moderated* as much as possible. It should even potentially be decreased slightly, but only if such a result can be achieved consistent with the ability to reasonably employ, mobilize and house our region's growing and partially-homeless population.

To do so, SCAG needs to study and promote more new housing opportunities within a more relaxed span of potential locations. Such a direction is desperately needed if our SCAG region is to have any realistic hope of fairly and affordably housing its population. Local governments, in turn, must explore, condition and approve many different kinds of new housing opportunities in the most relatively sensible locations. The new kinds of housing opportunities that should be pursued and their specific siting must take into account and include the following: (1) new urban development and redevelopment opportunities at varying densities, (2) the ongoing growth and expansion of budding and still-growing communities, and (3) well-planned, entirely new communities.

To its detriment, the draft Connect SoCal does not appreciably reflect either the ongoing expansion of budding and growing communities, or the future entitlement of any new, well-planned communities. Instead, the draft Connect SoCal largely comports with the same policy direction that underpins its recent RHNA allocation decision.

Even worse, the draft Connect SoCal literally boasts of its policy aim of curtailing any and all such organic development. For example, on page 36 of the draft Connect SoCal, the text reads:

*The conservation of natural area and farmlands on the edges of urban and suburban development is an integral aspect of Connect SoCal as it incentivizes infill development and the concentration of different land uses.* This makes it easier to travel shorter distances which reduces greenhouse gas emissions. Many counties and cities in Southern California have excelled in their work to protect these vulnerable lands, but few plans or policies have been enacted to preserve habitat and farmlands on a regional scale. With regional population increases, conservation decisions made now can safeguard the endurance of these lands, protecting threatened wildlife and the local agricultural economy, and reducing carbon emissions, while also contributing to a high quality of life for future generations.

Similarly, the draft Connect SoCal describes all land on the edge of existing development to be regrettably "vulnerable" to development, expressly stating on page 32 of the draft Connect SoCal the following (emphasis added):

A range of local conservation plans, habitat conservation agencies and state/federal park designated areas provide protection for a significant amount of natural and farmland in

the SCAG region. However, most of these protected lands are in remote desert areas far from incorporated areas .... Therefore, *a substantial amount of land on the urban and suburban fringe is vulnerable to development*.

Rather than lament the fact that peripheral, vacant land is “vulnerable to” development, SCAG should instead be encouraging local jurisdictions to ascertain which such land “on the urban and suburban fringe” is the most suitable for development. In particular, SCAG should be encouraging the counties’ supervisors, who respectively govern the use of nearly all of the vacant land suitable for smart development, to identify and make available for housing products the “land on the urban and suburban fringe” which is most suitable for smart development.

Importantly, the draft Connect SoCal also boasts of the fact that new single family residential construction has been falling as a *percentage* of total new residential construction in the SCAG region, while multi-family housing (apartments and attached condominiums) have conversely been gaining in terms of its relative share of all new residential construction. For example, concerning the typology or mix of new housing units in the SCAG region between 2006 and 2016, page 20 of the draft Connect SoCal reads in part:

In meeting ... new residents’ demand for housing, the [SCAG] region also added about 400,000 units from 2006 to 2016 – 54 percent of which were multi-family units. Comparing to current conditions in 2016, 39 percent of the region’s housing units are multi-family and 61 percent are single-family units. .... Riverside County and Los Angeles County again took the highest shares, ... and Los Angeles County added an additional 164,000 housing units - with 90 percent representing multi-family developments, largely occurring in denser areas that are well served by transit.

While the draft Connect SoCal thus boasts that new multi-family housing units have been gaining in the *relative share* of new housing units, the change in relative share has come at the expense of total number of all new housing units (as is shown by Figure 2.4 on page 21 of the draft Connect SoCal). In fact, the data shows that overall new housing production has fallen along with – and most likely primarily due to – a corresponding decrease in single family residential construction.

It must be understood and appreciated as well that the new, relatively-increasingly multi-family housing production about which the draft Connect SoCal boasts (such as Los Angeles County’s additions of mainly “multi-family developments, largely occurring in denser areas that are well served by transit”) tends to be the most expensive type of new residential housing. Indeed, highly urban, dense, new housing is relatively and increasingly unaffordable to most renters – let alone to most would-be homebuyers. To achieve some levels of affordability on this type of housing product often requires government funding, in part or in whole, through various “affordable housing” programs. While we have consistently supported the more reasonable types and levels of these programs and recognize their benefit, we have great concern that these programs are becoming increasingly necessary in order to make this type of housing project affordable. It must be the goal of the RTP/SCS, RHNA and any good housing plan to assure that it accommodates “market rate” affordable housing, which is housing that is built and funded by

the private sector and sold or rented at market rates affordable to Southern Californians. Given the size and scope of the region's housing shortage and the tremendous affordability gap, we must maintain and increase strong private sector participation in new housing production because there is simply not enough government funding to solve this massive problem through the public sector alone. Therefore, we must be wary of plans that are heavily dependent on government subsidies to achieve housing affordability.

These facts have led our group to conclude that SCAG needs to reconsider and reverse its policy of championing almost exclusively dense infill redevelopment to the exclusion of all new town, urban edge and greenfield development. Only by reversing such an institutional policy can SCAG play its proper role in solving the housing supply and related housing affordability crises that currently grip the SCAG region and California as a whole.

C. The Draft PEIR is Inadequate as a CEQA Disclosure Document.

As we discussed above, there is no evidence that the policy prescriptions reflected in the draft Connect SoCal will meet either the realistically regarded housing and transportation needs of the region, or provide for sustainability as required by SB 375. We believe that the draft Connect SoCal, if it were to be adopted as proposed, would instead negatively impact many elements of the human environment throughout the SCAG region, such as by greatly worsening vehicular congestion and homelessness, certainly displacing the poor, and the like. The draft PEIR purports to discuss the environmental impacts of the draft Connect SoCal. We believe that the draft PEIR fails to do so adequately.

The draft Connect SoCal would implement a variety of policy choices aimed at fostering more high density infill housing. The higher density housing typologies that the draft Connect SoCal aims to foster are frequently five to seven times more expensive to build than are one and two-story detached or attached structures in less dense and relatively peripheral communities. The latter communities more typically provide home rental and ownership options at prices that are relatively attainable to the region's workforce.

Similarly, the draft Connect SoCal would reject a more diverse range of transportation options (including voter-approved and funded transportation improvements) of types that would increase transportation efficiencies in the region. Instead, the draft Connect SoCal would singularly favor bus, electric scooter, and other transit modes which are either increasingly ineffective (e.g., fixed route bus transit) or infeasible in relation to the needs of many commuters within the region's workforce (e.g., electric scooter programs, which are no help to our region's construction workers, who must carry or move tools and material to jobsites).

As a disclosure document, the draft PEIR fails to identify, analyze, impose legally-mandated, feasible mitigation measures for the reasonably foreseeable consequence of the draft Connect SoCal's proposed implementation. It fails to disclose the scale and significance of unavoidable adverse impacts for impacts that cannot be mitigated through measures enforced by SCAG. The impacts which were unlawfully omitted from the analysis provided in the draft PEIR include:

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- The reasonably foreseeable demolition and displacement of existing uses in and near transit stations and corridors. Such demolition and displacement will cause significant localized noise and air emission impacts, significant new burdens on local infrastructure and public service, the significant or potentially significant displacement of local businesses (which will result in the absence of such businesses or greater travel distances to such local business services), and the significant or potentially significant displacement of existing residents who will most likely be forced to relocate to less costly residential locations farther away from their present workplaces, all with attendant increases in travel-related impacts such as the explosive growth of “supercommuters” with higher commute-related air emissions, health and safety hazards, traffic congestion, and noise impacts.
- The reasonably foreseeable ongoing increase in “supercommuters” – even for populations that are not physically displaced by urban, transit-oriented development. As was examined in a recent Chapman University study completed by economist John Husing, even households headed by union construction workers cannot afford a median priced home in any county that touches the ocean in Southern California.<sup>2</sup> The disconnect between the draft Connect SoCal’s high-cost, high-density, disproportionately infill housing vision assures that the pattern that Dr. Husing identified will continue and get worse.
- The draft PEIR fails to discuss the fact that there are and will remain no practical, fixed-route public transit options to serve the distantly-residing construction workers and other middle class households who need their mobility. The draft Connect SoCal’s prioritization of mass transit over roadway expansions would therefore worsen the growing tendency toward gridlocked conditions. Consequently, work force commutes will lengthen – thereby increasing air emissions and causing other adverse impacts. These are not speculative impacts: both the housing shortage and affordability crises and the performance of the SCAG region’s transportation network worsened after the first two rounds of RTP/SCS plans were adopted; and the draft Connect SoCal, especially when viewed in light of SCAG’s recent actions involving the sixth-cycle RHNA allocation, would effectively double down on the unsuccessful over-dependency and over-emphasis on fixed-route, public transit. SCAG’s own transit studies demonstrate that housing density does not result in increased transit ridership because, in the real world, jobs are widely distributed throughout the region and workers (including low income hourly wage workers) often can practically commute only by using cars.<sup>3</sup>

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<sup>2</sup> John E. Husing, “Impact of California’s Housing Prices on Construction Workers,” March 3, 2019, available at: <https://www.newgeography.com/content/006254-impact-californias-housing-prices-construction-workers>

<sup>3</sup> See, e.g., UCLA “Falling Transit Ridership: California and Southern California,” available at: <https://www.its.ucla.edu/2018/01/31/new-report-its-scholars-on-the-cause-of-californias-falling-transit-ridership/>

- There is clearly not enough public funding to bridge the massive gap between (i) the costs of constructing high-density, infill-only housing, and (ii) the lower cost of the housing that is actually needed by affordable to middle class households in the region. Relatively affordable housing is widely available outside the SCAG region. Because of California’s stringent building and efficiency codes, and its commitments to renewable energy and electric and other alternative energy vehicles and modes of transit, California’s future residents are projected to have the lowest per capita GHG footprint in the nation. By failing to solve the housing shortage and affordability crises, our society will worsens GHG emissions globally by forcing an increasing number of Californians to relocate to other regions, states or nations where housing is more affordable. Presently, the top three out-migration destinations for departing Californians are Texas, Nevada and Arizona; and they all have far higher per capita GHG emissions. The draft PEIR discusses and analyses no impacts related to such out-migration caused by the draft Connect SoCal’s foreseeable worsening of the housing supply and affordability crises.

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The Program EIR also fails to identify all feasible mitigation measures for the scores of significant unavoidable adverse impacts it identifies. Even though SCAG cannot itself implement or enforce some potential mitigation measures, CEQA requires that the final EIR must identify feasible measures to avoid or reduce impacts and note, where applicable, that such measures can and should be implemented by other agencies. Measures such as reducing housing costs through accelerated and by-right entitlement approvals, reducing fees and other regulatory costs, and enhancing local government revenues with tax-increment financing to pay for the community infrastructure and public service improvements needed to accommodate new housing, are omitted from the PEIR. The omission must be corrected.

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The draft PEIR does and analyze the foreseeable failure of VMT reduction policies, taking into account the region’s plummeting transit ridership and the evidence that any growing population which enjoys strong employment typically has increased or barely reduced per capita VMT; but has never significantly reduced it. The draft PEIR fails to identify and alternate GHG reduction strategies (other than VMT reduction) which could more feasibly and beneficially reduce regional GHG. Moreover, even if CARB continues to dictate that SCAG must envision and plan for large per capita VMT reductions, the draft PEIR should have analyzed and discussed the broader environmental impacts and potential mitigation of such a policy.

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In addition, the draft PEIR also omits any discussion of the reasonably foreseeable cumulative impacts that will flow from the 2019 determination that SCAG must allocate more than 1.34 new housing units through the RHNA process for the sixth cycle of RHNA, and that SCAG has already decided to disproportionately allocate that large number of housing units to the more expensive, relatively near-coastal areas and communities. Although the localities’ respective general plans have not yet been amended to make sites available for these housing unit allocations, CEQA does not allow for the deferral of consideration of cumulative impacts analyses for reasonably foreseeable new projects and activities simply because they have not yet been fully or finally approved. The draft PEIR must be reworked to include discussion of the consequences of tripling the availability of housing unit sites and SCAG’s decision to largely

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focus this large quantity of new potential housing units in the already dense, expensive near-coastal communities.

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Finally, because of all of the concerns which are stated above in this comment letter, the draft Connect SoCal policy document and the related draft PEIR should each be revised to include an alternative – one that will actually result in more ameliorative housing and transportation solutions for the region.

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The draft PEIR’s fails to adequately identify, analyze and/or discuss the mitigation of environmental impacts. It fails to identify the reasonably foreseeable consequences of the cumulative housing increase prescribed by the RHNA process. Both it and the draft Connect SoCal fail to identify and analyze an alternative that would actually result in housing and transportation solutions needed by this region. These are all flaws that can be remedied only if SCAG were to recirculate a revised draft PEIR which corrects its deficiencies. This is all the more reason for SCAG to seek and obtain a one-year extension in additional time to revise and ultimately adopt a better Connect SoCal.

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D. Conclusion.

To summarize our conclusions:

- We believe that the draft Connect SoCal compounds the policy mistakes that were latent in SCAG’s prior two RTP/SCSs but are now recognizable in light of the housing crisis; and it is, therefore, not a sound plan for the region. Whereas a major policy course correction is needed to best address the region’s housing supply dearth and housing affordability crisis, the draft Connect SoCal would combine with SCAG presently-proceeding RHNA allocation to worsen these crises.
- SCAG should therefore request a one-year extension of time during which to entirely revisit the draft Connect SoCal, and substantively re-make it with a view toward better balancing the environmental and transportation goals of the RTP/SCS with approaches that will address more urgently and deliberately the region’s housing supply and affordability crises.
- The draft PEIR is legally infirm as it now reads, and should be redone when analyzing a substantially new, more realistic and more achievable regional plan.
- If we are correct in assuming that a resulting, newly-drafted, more realistic and more achievable regional plan will conflict with CARB’s overly-ambitious per capita VMT reduction, then we urge SCAG to prepare and adopt both a SCS and a complementary APS for presentation to CARB.

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We have always recognized the daunting regulatory and administrative challenges that are inherent in SB 375 and the federal requirements with which SCAG must comply. We

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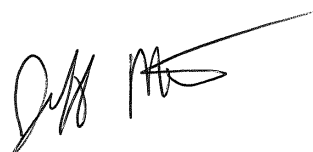
recognize that it will be a major challenge for SCAG’s staff to re-evaluate all of the VMT implications of envisioning a more circumspect regional land use plan than those which underpinned SCAG’s last two RTP/SCSs and now underpin the draft Connect SoCal and its draft PEIR. It is especially challenging to do so in a way that better accommodates the large housing needs assessment that must be allocated regionally via the sixth-cycle RHNA process. We remain, however, confident in SCAG and both its Regional Council and professional staff to lead the way on smart, innovative approaches for solving our region’s most daunting problems. Likewise, given our longstanding involvement with the SB 375 process and the depth of our concerns, we look forward to continuing to work with SCAG and participating in ongoing discussions about Connect SoCal. With such collaboration in mind, we respectfully ask for your meaningful consideration of these comments.

23

Sincerely,



Richard Lambros  
 Managing Director  
 Southern California Leadership Council

Jeff Montejano  
 Chief Executive Officer  
 Building Industry Association of Southern California (BIASC)




Ray Baca  
 Executive Director  
 Engineering Contractors’ Association




Mike Gunning  
 Senior Vice President, Legislative Affairs  
 California Building Industry





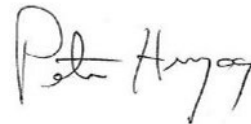
Michael W. Lewis  
Senior Vice President,  
Construction Industry Air Quality Coalition



Paul Granillo  
President & CEO  
Inland Empire Economic Partnership



John Hakel  
Executive Director  
Southern California Partnership for Jobs



Peter Herzog  
Assistant Director of Legislative Affairs  
NAIOP SoCal



Denise Cooper  
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**United Service Workers West**



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January 24, 2020

**ORG-14**

VIA EMAIL

Roland Ok  
Southern California Association of Governments  
900 Wilshire Blvd., 16<sup>th</sup> Floor  
Los Angeles, Ca 90017  
[2020PEIR@SCAG.CA.GOV](mailto:2020PEIR@SCAG.CA.GOV)

**RE: DRAFT PEIR COMMENTS FOR 2020 RTP/SCS (SCH # 20199011061)**

Dear Mr. Ok:

Service Employees International Union – United Service Workers West, on behalf of its members (collectively "USWW" or "Commentor"), appreciates the opportunity to comment<sup>1</sup> on the referenced draft Program Environmental Impact Report ("PEIR")<sup>2</sup> for the draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy plan ("Plan" or "2020 RTP/SCS"),<sup>3</sup> prepared by the Southern California Association of Governments ("SCAG") pursuant to the California Environmental Quality Act, Pub. Res. Code § 21000 *et seq.* ("CEQA").<sup>4</sup>

1

In short, USWW writes with regard to the Plan's air quality analysis and growth forecasts. Concerning is the absence of any modeling under newer EMFAC2017 models that may disclose additional air quality impacts. It is unclear whether the Plan's General Conformity Determination accounts for additional, updated projects that have already been credited with emission budgets under applicable air quality plans. Finally, the Plan's growth assumptions seem untethered to the SCAG region's historic growth record. USWW respectfully requests clarification on these issues in a recirculated or final PEIR.

2

**I. STANDING OF COMMENTOR**

USWW and its sister local unions have many thousands of members who reside and work in the SCAG region which this Plan covers. They will be directly affected by impacts under the Plan, such as traffic, air quality, GHG and noise.

This comment letter is made to exhaust remedies under administrative law principles and Pub. Res. Code § 21177 concerning the Plan, and incorporates by this reference all written and oral comments, in their entirety, submitted on the Plan or PEIR by any commenting party or agency. It is well-established that any party, as Commentor here, who participates in the administrative process can assert all factual and legal issues raised by anyone.<sup>5</sup>

3

<sup>1</sup> Please note that pages cited herein are either to the page's stated pagination (referenced herein as "p. ##") or the page's location in the referenced PDF document (referenced herein as "PDF p. ##").

<sup>2</sup> Inclusive of all appendices (referenced herein as "APP-##") provided on SCAG's PEIR webpage. See <https://connectsocal.org/Pages/Draft-2020-PEIR.aspx>.

<sup>3</sup> Inclusive of all technical reports (referenced herein as "TR-[name]") provided on SCAG's Plan webpage. See <https://connectsocal.org/Pages/Connect-SoCal-Draft-Plan.aspx>.

<sup>4</sup> Inclusive of State CEQA Guidelines, 14 Cal. Code Regs. § 1500 *et seq.* ("CEQA Guidelines").

<sup>5</sup> See *Citizens for Open Government v. City of Lodi* (2006) 144 Cal.App.4th 865, 875.

II. SPECIFIC COMMENTS REGARDING DRAFT PLAN/PEIR

1. Use of EMFAC2014 Rather Than EMFAC2017 Is Concerning

It appears that the Plan’s air quality, health risk assessment, and GHG analysis utilizes the older EMFAC2014 modeling per the two-year grace period provided by the U.S. EPA for regional conformity analysis.<sup>6</sup> Yet, the newer EMFAC2017 modeling may show more significant air quality emissions that should be translated into human health impacts in order to fulfill CEQA’s informed decision-making purposes. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502. So too, it is unclear whether the grace period for using the old EMFAC2014 model applies to the entire 2020 RTP/SCS PEIR analysis or is limited strictly to the federally-required General Conformity Determination (“GCD”).

4

Commentor requests clarification regarding the utility of the 2020 RTP/SCS PEIR absent an EMFAC2017 modeling. For example, would future addendums to the PEIR include brand new EMFAC2017 modeling? Will future projects after the expiration of the grace period have to do *both* an EMFAC2014 modeling (to show consistency with 2020 RTP/SCS assumptions) and EMFAC2017 modeling to disclose emissions otherwise undisclosed in this PEIR? What specific mitigation measures are incorporated now to ensure future impacts disclosed pursuant to EMFAC2017 modeling are addressed?

2. Available General Conformity Determination Emission Budgets Are Not Updated

The Plan claims that air emissions associated with the 2020 RTP/SCS are within the air quality emission Budgets under applicable State Implementation Plans (“SIP(s)”) and local Air Quality Management Plans (“AQMP(s)”), and thus the Plan satisfies its federally-mandated General Conformity Determination.<sup>7</sup> First, as noted above, this analysis relies on EMFAC2014 modeling under a soon-lapsing grace provision,<sup>8</sup> which may very well leave impacts unanalyzed and unmitigated.

Second, the Plan compares Plan emissions against applicable emission Budgets,<sup>9</sup> often finding slim to no emission Budgets remain after deducting the Plan’s emissions. It is unclear, however, whether this analysis accounts for recent projects not already included in the applicable AQMP that rely on local General Conformity Budgets. For example, a warehouse logistics project at San Bernardino International Airport just approved in December 2019 exceeded *de minimis* thresholds and required a GCD under the National Environmental Protection Act.<sup>10</sup> There, the project relied on set-aside General Conformity Budgets tracked by South Coast Air Quality Management District (“SCAQMD”).<sup>11</sup> As indicated by SCAQMD, SCAQMD tracks projects requiring GCDs that utilize General Conformity Budgets and the Budgets “are in high demand and have a limited availability.”<sup>12</sup> Here, it is unclear whether the Plan’s GCD accounts for the recent projects that have already secured these highly sought after General Conformity Budgets.

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<sup>6</sup> See Plan, TR-Transportation Conformity Analysis, p. 28; PEIR, pp. 3.3-19, 3.3-50, 3.3-76, 3.8-60, 3.8-74.

<sup>7</sup> See PEIR, p. 3.3-52, 3.3-69; Plan, TR-Transportation Conformity Analysis, pp. 2-4, 108.

<sup>8</sup> See Plan, TR-Transportation Conformity Analysis, pp. 25, 287.

<sup>9</sup> *Ibid.*, pp. 28-41.

<sup>10</sup> See Eastgate GCD, PDF p. 10, <http://bit.ly/3aEJsHt>.

<sup>11</sup> *Ibid.*, PDF p. 31-34, 95-96.

<sup>12</sup> *Ibid.*

Commentor therefore requests clarification whether the Plan and PEIR account for available General Conformity Budgets. For example, do the emission Budgets in the Plan include set-aside General Conformity Budgets? Has SCAG consulted with SCAQMD and other relevant agencies about the updated status of available General Conformity Budgets that are highly sought after by project-proponents? Does SCAG, much less the public, know how much of the Budgets have already been allocated, and how much remains? All this should be provided in a recirculated or Final PEIR.

5

3. Growth Assumptions May Lack Substantial Evidence

The 2020 RTP/SCS anticipates a significant increase in airplane passenger volume for the SCAG region with passenger enplanements increasing from 110.17 million annual passengers ("MAP") in 2017 to 197.14 MAP in 2045 (i.e., an increase of 86.97 MAP), which amounts to a Compound Annual Growth Rate ("CAGR") of approximately 2.1 percent during those 28 years.<sup>13</sup> This level of growth is out of line with the area's historic track record and more akin to the trajectory anticipated under old SCAG plans that have proven unreliable. Table 1 below shows the anticipated growth in passenger enplanement SCAG-wide under this Plan and prior SCAG plans over their respective planning periods, and historic growth from 1997 to 2017. As the below table indicates, past plans have consistently overestimated anticipated growth as compared to actual growth (i.e., 1.55 percent actual growth from 1997-2017).

TABLE 1: PRIOR ANTICIPATED GROWTH UNDER SCAG PLANS

RTP	Base		Forecast		Trend	
	Year	MAP	Year	MAP	Period	CAGR
2001	1997	81	2025	167	28	2.62%
2004	2002	77.8	2030	170	28	2.83%
2008	2007	89.53	2035	165.3	28	2.21%
2012	2009	79.1	2035	145.9	26	2.38%
2016	2013	88	2040	136.2	27	1.63%
2020	2017	110.17	2045	197.14	28	2.10%
Historic	1997	81	2017	110.17	20	1.55%

6

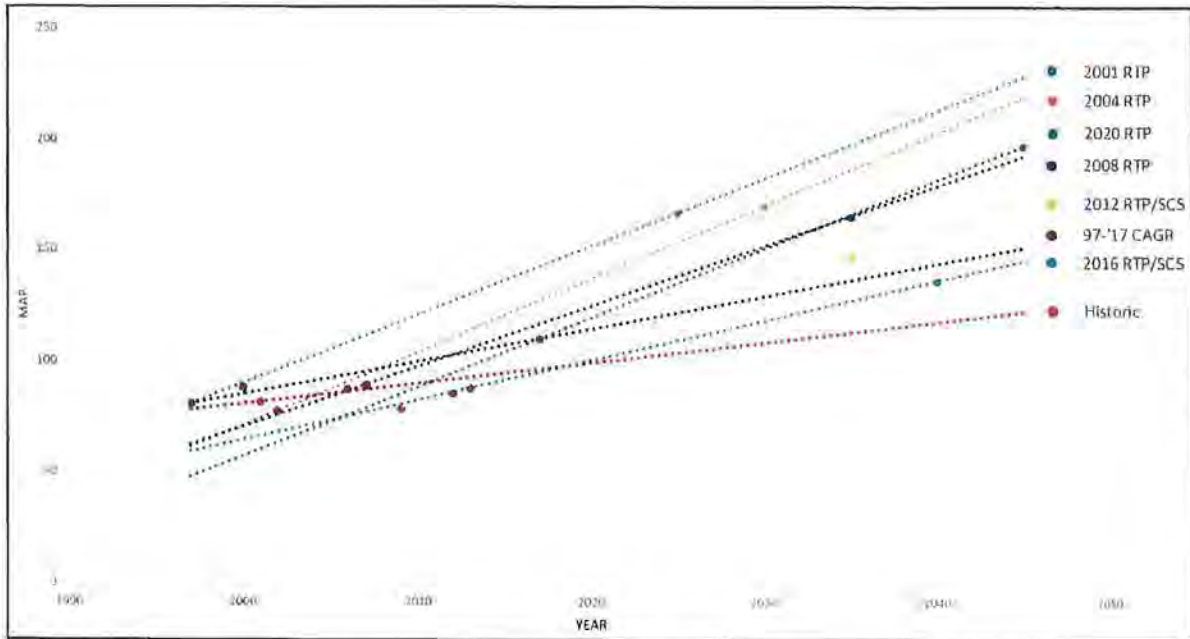
The linear trajectory of the above growth projections are reflected in Figure 1 on the following page, which shows the 2045 anticipated growth under the proposed 2020 RTP/SCS (green) is near levels anticipated under the older 2001 RTP (blue), 2004 RTP (orange), and 2008 RTP (purple); and much higher than anticipated growth under the newer 2012 RTP/SCS (yellow) and 2016 RTP/SCS (light blue). As compared to historic levels reported by SCAG between 1997 through 2017 (red),<sup>14</sup> those older RTP forecasts overestimated passenger growth significantly. So too, those older plans overestimated growth

<sup>13</sup> See Plan, p. 81; Plan, TR-Aviation & Airport Ground Access, p. 33; PEIR, APP-3.13, PDF p. 37.

<sup>14</sup> According to SCAG-reported figures, the SCAG-wide region had 81 MAP in 1997, 88.5-88.7 MAP in 2000, 81.9 MAP in 2001, 77.8-77.9 MAP in 2002, 87.9 MAP in 2006, 89.4-89.53 MAP in 2007, 79-79.1 MAP in 2009, 85.8 MAP in 2012, 88 MAP in 2013, and 110.17 MAP in 2017. See e.g., 2020 RTP/SCS, TR-Aviation and Airport Ground Access, p. 26; 2016 RTP/SCS, Aviation Airport Ground Access Appendix, p. 1, <http://bit.ly/2tEwfxP>; 2012 RTP/SCS, PDF p. 106, <http://bit.ly/2RrJvip>; 2008 RTP, Aviation and Airport Ground Access Report, PDF p. 30, <http://bit.ly/2GllrXT>; 2004 RTP, PDF p. 144, <http://bit.ly/36rk3NY>; 2001 RTP, PDF p. 113, <http://bit.ly/3aKl1aD>.

as compared to the CAGR trajectory based on the actual levels reached from 1997 and 2017 (black).<sup>15</sup>

FIGURE 1: PASSENGER FORECASTS COMPARED TO HISTORIC LEVELS



As indicated in the above figure, the trajectory of the region’s actual track record (i.e., black and red) is relatively low and much more in keeping with the trajectory under SCAG’s 2012 and 2016 RTP/SCS growth forecasts, which collectively anticipate passenger volume in 2045 in the range of 145-170 MAP. It would seem that, after 16 years of consistently lowering forecasted passenger volumes in each successive RTP, SCAG is now changing course under an apparent pro-growth plan that may not be supported by substantial evidence.

The 2020 RTP/SCS derives its 2.10 percent CAGR growth rate based on factors described only generically and is facially out of line with the region’s long-term track record that has seen only a 1.55 percent CAGR in passenger enplanement from 1997-2017. This discrepancy is due, in part, to the Plan’s emphasis on recent growth rates from narrow time periods (e.g., 2012-2017 returning to normal levels after sharp declines in the wake of the 9/11 attacks and the Great Recession), based on largely forecasted numbers that have yet to be proven accurate (e.g., 2018-2045), and from jurisdictions that are dissimilar from the SCAG region (e.g., emerging countries like Africa and Asia/Pacific).<sup>15</sup> As a long-term planning document, the RTP/SCS must give adequate weight to the SCAG-region’s actual performance over the long-term, such as SCAG’s 1.55 percent CAGR from 1997-2017 and the 1.3 percent CAGR from 2000-2017 (i.e., from 88.5 MAP in 2000 to 110.1 MAP in 2017).<sup>17</sup> Furthermore, given that the State and region have

<sup>15</sup> This 1997-2017 CAGR trajectory is higher than the red trajectory because it only includes the historic levels at 1997 and 2017, excludes lower MAP levels in interim years largely attributed to the 9/11 attacks and the Great Recession. See Plan, TR-Aviation & Airport Ground Access, pp. 26, 29.

<sup>16</sup> See Plan, TR-Aviation & Airport Ground Access, pp. 22, 28 (TbIs. 6 & 9).

<sup>17</sup> *Ibid.*, pp. 27, 29.

experienced ten-years of continued economic growth, a softening of the economy is foreseeable, which will undoubtedly affect passenger travel. This seems to be entirely overlooked by the Plan and PEIR. As such, Commentor requests clarification regarding the adequacy of the Plan's growth projections. For example, what modeling and source data was used to derive this 2.10 CAGR? Why does the Plan/PEIR fail to specify exactly what levels were in prior years? How effective is this model compared to the region's track record?<sup>18</sup> Why is there no consideration for the cyclical nature of the economy?

Moreover, each SCAG airport is assumed to accommodate this growth at different volumes and at different CAGRs, as reflected in Table 2 below. So too, the Plan anticipates some airports will have significant increases or decreases to their respective regional share of passenger volume.

**TABLE 2**

Airport	2017		2045		MAP CAGR (2017-2045)
	MAP	% of Total	MAP	% of Total	
BUR	4.74	4.3%	9.00	4.6%	2.3%
IPL	0.012	0.0%	0.30	0.2%	12.2%
LAX	84.56	76.8%	127.00	64.4%	1.5%
LGB	3.783	3.4%	5.50	2.8%	1.3%
ONT	4.552	4.1%	33.00	16.7%	7.3%
OXR	0.00	0.0%	0.30	0.2%	n/a
PMD	0.00	0.0%	1.82	0.9%	n/a
PSP	2.10	1.9%	5.00	2.5%	3.1%
RIV	0.00	0.0%	0.61	0.3%	n/a
SBD	0.00	0.0%	1.81	0.9%	n/a
SNA	10.423	9.5%	12.50	6.3%	0.7%
VCV	0.00	0.0%	0.30	0.2%	n/a
<b>TOTAL</b>	<b>110.17</b>	<b>100%</b>	<b>197.14</b>	<b>100%</b>	<b>2.1%</b>
<i>Notes:</i>					
n/a CAGR not calculated given SCAG provides no base year values.					

6

In addition to concerns about overstated growth projections, Commentor therefore requests clarification about the timing of these purported MAP increases. For example, how does the PEIR account for and mitigate more severe local impacts that could be caused by accelerated increase in MAP at a particular airport within the first five or ten years of the planning period, instead of evenly spread out over the Plan's full 25+ year time period? Alternatively, in this circumstance how does the PEIR account for disruptions in the Plan's modeled regional share of passenger volume for each airport?

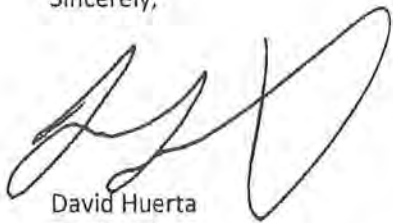
<sup>18</sup> For example, if the current model used in the Plan was used under prior RTPs, how accurate would the model's forecasts be compared to historic passenger volumes.

III. CONCLUSION

USWW appreciates the opportunity to provide these comments to SCAG and looks forward to a meaningful response to these fundamental questions. Commentor reserves the right to supplement these comments at future hearings and proceedings for this Plan. Finally, to the extent not already on the notice list, Commentor requests all notices of CEQA actions, Plan CEQA determinations, or public hearings to be held on the Plan/PEIR under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them.<sup>19</sup> Please send notice by electronic and regular mail to: [casey.coward@seiu-usww.org](mailto:casey.coward@seiu-usww.org), 1650 Harbor Bay Parkway, Suite 200, Alameda, CA 94502.

7

Sincerely,



David Huerta  
President  
SEIU United Service Workers West

<sup>19</sup> See Pub. Res. Code §§ 21080.4, 21083.9, 21092, 21092.2, 21108, 21167(f).





**ORG-15**

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January 22, 2020

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To whom it may concern,

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) (collectively called Connect SoCal). In 2012, with release of the prior RTP/SCS, Friends of Harbors, Beaches and Parks coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. The Bolsa Chica Land Trust is now a part of this growing coalition in 2020.

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Grace Winchell

The Bolsa Chica Land Trust is a 5,000 member non-profit organization established in 1992. Our mission is the acquisition, preservation and restoration of all of Bolsa Chica and the education of the public to its natural wonders and cultural significance. The Bolsa Chica Ecological Reserve, located on our Orange County coastline, is owned and managed by the State. Bolsa Chica is an international birding location visited by approximately 80,000 visitors each year. Over the course of our 27 year history, BCLT has been the catalyst for the protection of hundreds of acres of coastal wetlands and 118 acres of coastal uplands at Bolsa Chica from development.

**ENDORSEMENTS**

Amigos de Bolsa Chica  
Algalita Marine Research  
Foundation  
Anza Borrego Foundation  
Ballona Wetlands Land  
Trust  
City of Huntington Beach  
City of Seal Beach  
Friends of Harbors,  
Beaches and Parks  
Huntington Beach  
Wetlands Conservancy  
Huntington Beach Tomorrow  
Orange Coast League of  
Women Voters  
Orange County  
Coastkeeper  
Peninsula Open Space Trust  
Sea and Sage Audubon  
Sierra Club  
Angeles Chapter  
Surfrider Foundation

We offer the following comments on the Natural and Farmland policy, goals, and next steps.

We are pleased to see conservation of our natural lands as one of the 10 main policies of Connect SoCal. Land preservation not only reduces greenhouse gas (GHG) emissions, but also sequesters carbon. Any investment in habitat restoration improves this sequestration potential as well. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful, and science-based role in mitigating impacts to our natural environment from transportation, infrastructure, and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. We thank you for your leadership.



BCLT agrees that future development should be focused in existing city-centers and near transit. When developments are built in the city center, it relieves pressure from the fringe. However, the Plan fails to outline exactly how (or with what conservation mechanism) these fringe lands (or any lands) will actually be protected. Just because the pressure is relieved by focusing development elsewhere, doesn't mean the land then automatically becomes protected. Numerous organizations, ours included, focus our work on protecting important habitat lands. A lot of time, energy, money, strategy, and political will are combined to create a successful conservation transaction that lead to permanently conserved lands. Further, just because local agencies may be contributing to the conservation arena, in no way should you discount the roles of the conservation non-profit community. In short, SCAG must identify the actual mechanism, process or plan on how the greenfields and agricultural lands will be protected.

Many of the benefits of open space and parkland have been outlined in the Plan and Natural Lands Appendix. In addition, there are many economic benefits of open space. These are realized through increased property values, ecosystem services, support of local businesses through park visitor purchases, and a reduction in the urban heat island effect. Further, conservation of natural lands has many on-the-ground co-benefits like access to recreational opportunities, preservation of important habitats and species, protection of cultural and archeological sites, increased job opportunities, protection of threatened/endangered species, and environmental education experiences. Our natural lands filter water, clean the air, and provide homes for wildlife. Natural lands preservation also protects our watersheds, rivers, and water sources. Voters consistently support measures that benefit their local water and natural resources.

The Plan outlines that the region anticipates an additional 3.8 million people by 2045 providing increased pressure to our existing parkland. Existing studies document that many communities in the Southern California region already do not have enough parkland as outlined by the Quimby Act (five acres per 1000 residents). As cities grow, more parks and more park access will be needed. What is the mechanism for this? Additionally, and more importantly, these city parks are fundamentally different than habitat-focused parks. Usually city and regional parks include high intensity activities, like turfed soccer and baseball fields. The types of land acquired as mitigation or through local conservation efforts typically focus on preservation of natural habitat and less intensive uses (birding, hiking, etc.). In fact, many of these mitigation lands have limited or managed public access. Providing "more" access to either high or low intensity parks and/or habitat lands may have significant consequences for the land manager. How additional access will be provided should be addressed, as well as how additional lands will actually be acquired and preserved.

Wildlife corridors are critical components to Southern California conservation efforts. Ensuring survival of the top predator and the suite of species in the ecosystem means our natural lands must also maintain environmental functions, be sustainable over the long term, and include plans for long term stewardship. The issue is that many housing and transportation projects eliminate the wildlife movement corridors and fragment the landscapes into smaller, less viable pieces of land. Ensuring our open spaces are connected to one another is essential for species survival. Wildlife corridors allow landscapes to maintain ecological functions, allow places for regeneration after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan would be stronger if it supported the enhancement of and/or protection of documented wildlife corridors *prior to commencing* impactful projects.


Many non-profits like BCLT are working to ensure additional bays, estuaries, wetlands, bluffs, and beaches are preserved forever. Additionally, one way our coasts are connected to inland areas are through our rivers and streams. These riparian areas serve as recreational trail corridors, water recharge and infiltration locations,

and serve as places our wildlife use for watering sources. However, transportation and land use generated urban runoff are still problems. Our beaches and coastline are inundated with pollution. Litter, debris, and pollutants should be decreased prior to reaching the coast. Ensuring everyone has a positive experience on the sand and in the surf should be our goal, but we need to address Southern California’s trash problem.

One key way to improve the environment is through restoration projects. These can be on land, in riparian areas, and even in the ocean. Restoration provides benefits by adding native plants, removing the non-native plants and their seedbank, as well as increasing carbon storage, and providing improved habitats for our wildlife. Our environment benefits from these improvements, as do our watersheds, our air, and our communities. Having improved habitats means that our water is cleaner, our soils won’t erode as easily, it creates jobs for local residents, and our unique biodiversity is maintained. Further, the many endemic and threatened/endangered plants and animals benefit from these restoration projects as well. Thank you for including restoration as a key component in the natural lands and agricultural policy. We feel it is important to note that although restoration dollars are available through State measures, there is overwhelming competition for those dollars, particularly for Southern California where restoration projects are typically more expensive to implement. SCAG support of restoration will be an important element to achieving restored and functioning habitats.

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix. Should you need to contact me, I can be reached at (714) 846-1001. In addition, we request to be included on any notifications (electronic or otherwise) about this policy’s creation and implementation, please send information to me at [Kim@bclandtrust.org](mailto:Kim@bclandtrust.org).

Sincerely,



Kim Kolpin  
Executive Director

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*The Bolsa Chica Land Trust is a Non-Profit, 501(c)3 organization. All donations are tax deductible to the extent allowed by law. Our tax ID# 33-0516059.*





January 22, 2020

Submitted through the Connect SoCal website:

<https://www.connectsocial.org/Pages/Connect-SoCal-Comment-System.aspx>

Attn: Connect SoCal Team  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017

RE: Comments on the 2020 Draft Connect SoCal

Dear Connect SoCal Team:

Friends of Harbors, Beaches and Parks (FHBP) has been engaged with the Southern California Association of Governments (SCAG) for many years—most recently through its ongoing Natural Lands Working Group. In 2012, we formed a coalition that promoted open space policies and regional advance mitigation programs (RAMPs) at the SCAG level. These policies were ultimately adopted by SCAG leadership in the 2012 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). This was done a second time with the 2016 RTP/SCS. We are pleased to gain a broader, more inclusive, and geographically diverse coalition for the 2020 Plan (Connect SoCal) and though we have substantive comments below, we are supportive of the 2020 Connect SoCal Natural and Farmlands policies.

While FHBP mainly focuses its work in Orange County, we have been able to relay our experiences with the successful RAMP under the Orange County Transportation Authority's (OCTA) Renewed Measure M to other county transportation agencies in California. Measure M2's Environmental Mitigation Program has permanently protected 1,300 acres and restored nearly 350 acres throughout Orange County. This innovative program enables 13 freeway projects to collectively mitigate impacts with large landscape-level mitigation, instead of small individual project-by-project mitigation efforts. It streamlines the environmental review and permitting process, allows projects to come in under budget, builds a positive working relationship with resource and permitting agencies, allows more thoughtful science-based conservation planning to occur, and is supported by many conservation and community organizations. This, and our involvement in the creation of the Natural Lands Policy in the 2012 Orange County SCS, drew our attention and focus to the SCAG RTP/SCS and opportunities for a more regional effort there. We are grateful to be involved in the process and to have developed an excellent working relationship with SCAG leadership and staff.

Below are our comments on the SCAG Connect SoCal Plan segmented by topic and chapter.

Additions shown as *italics*

Deletions shown as ~~strikethrough~~

## SoCal Connect (Plan)

### Executive Summary

We support the focus of “Fit it First” and encourage local transportation agencies to stop building new roads. History has shown that building new roads or widening freeways and roads does not solve the traffic problem—it simply allows more single occupant vehicles to be on the road, which SCAG is trying to avoid to reduce greenhouse gas emissions (GHG) and vehicle miles traveled (VMT).

It is exciting to see new tools such as tax increment financing included in the plan. However, there was a missed opportunity in the Executive Summary and throughout the Plan itself. We believe that tax-increment finance districts can and should be used to fund open space conservation. Our parks and open spaces are part of the community infrastructure that our taxes support—as the cities grow, so will our need for more parkland. Further, most cities do not meet the requirements of the Quimby Act. The 1975 Quimby Act established a statewide requirement that developers set aside land, donate conservation easements, or pay fees for park improvements (called park in lieu fees). Many jurisdictions have enacted local ordinances that require the maximum number of park acres per person under the Quimby Act - or 5 acres per 1,000 residents. As more houses are built and more land is used, more parkland will be needed as well. We suggest the following modifications:

#### **Proposed Policy Modification (Plan, Pg. 49)**

Support cities in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure, *including parks and open space*, and development projects.

Similarly, the comment about value capture tools and financing also applies to the “Support Implementation of Sustainability Policies” in the SCS (Pg. 27 & 29), as parks are part of our community infrastructure.

#### **Proposed Modification (SCS, Pg. 27)**

Support cities in the establishment of EIFDs, CRIAs, or other tax increment or value capture tools to finance sustainable infrastructure, *including parks and open space*, and development projects.

#### **Proposed Modification (SCS, Pg. 29)**

TIF is an important tool in the creation of sustainable communities, and NIFTIs specifically can fund multifamily affordable housing, transit capital projects, transit-oriented development, complete-streets capital projects, parking, *parks and open space*, and programs to reduce GHG emissions and VMT within TPAs.

### Overarching Goals

We appreciate the effort to locate housing, jobs, and transit closer together and in priority growth areas, while simultaneously preserving natural resources and farmlands. It was great to see this consistent thread woven throughout the document.

When reviewing the 10 priorities of the Connect SoCal Plan, we noticed that the preservation of natural resources and farmlands actually aligns well with several other goals including:

1. Encourage regional economic prosperity and global competitiveness.
5. Reduce greenhouse gas emissions and improve air quality.
6. Support healthy and equitable communities.
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network.

Often one policy can support another, and this can be accomplished with the goal of conservation.

### **Chapter 1: How the Plan was Developed**

As the Plan was being developed, participants (FHBP included) in the planning workshops were asked to review four potential growth scenarios and strategies that go with those scenarios. Unfortunately, we found this exercise inequitable because not all growth scenarios apply to every geography in the SCAG region and therefore the strategies cannot apply equally across the region either.

For example, in a very urban area, creating an urban growth boundary or setting aside land for conservation is not feasible or realistic. However, those actions could work in areas that are still bordered by natural lands and are more suburban or rural. Different geographies need different strategies and different conservation tools. We hope that, in the next scenario development exercise in 2023, this will be considered and therefore make the exercise more realistic. Accordingly, we make the following suggestion:

#### **Solution for Future Plan Exercises**

Be cognizant of the tools provided and how they will or will not apply to each land use type. For example, tools used in an urban geography are likely not the same as those used in a rural geography.

### **Chapter 2: SoCal Today**

We appreciate acknowledgement in the document that our habitat lands face severe development pressure and that those same lands are a valuable asset to our region, residents, and visitors. However, the document implies that construction, infill, and other “development based” activities are the only activities to generate economic growth. It is important to note that our natural lands and agricultural industry are also economic engines for the region. For every dollar invested in conserving natural lands, an estimated \$2.37 is generated through local sales, recreation purchases, gas, and snack/food purchases from outdoor enthusiasts. This is significant in its own right.

We commend cities and counties that prioritize conservation of our open spaces. Between acquisitions, policy adoption, mitigation measures, and public-private partnerships, local and regional governments have been successful at adding natural lands to the inventory. Here are a few of those examples:

- Laguna Beach residents (Orange County) taxed themselves decades ago to fund what essentially became an urban growth boundary around the city to protect their quality of life by purchasing hillsides.
- In San Bernardino County, efforts are currently underway to create a Regional Conservation Investment Strategy that closely links appropriate development locations with priority conservation areas.
- In Los Angeles County, a newly updated ordinance focuses on areas in need of more protection due to sensitive natural resources through an updated Significant Ecological Area layer.
- In Ventura County, residents passed Save Open Space and Agricultural Resources (SOAR), which includes a series of eight voter initiatives that require a majority vote of the people before agricultural land or open space can be rezoned for development.
- Both Riverside and Imperial Counties have implemented thoughtful conservation plans that aim to protect thousands upon thousands of acres as development and transportation projects advance.

While cities and counties participated in land preservation, conservation based non-profits have also contributed, delivering numerous park bonds, public and private conservation dollars, and acquisition and restoration projects that benefit our region. It is a disservice to limit acknowledgement of the conservation efforts to only municipalities. Therefore, we propose these modifications:

**Proposed Modification (Plan, Pg. 36)**

Many counties, *cities* and ~~cities~~ *conservation groups* in Southern California have excelled in their work to protect these vulnerable lands, but few plans or policies have been enacted to preserve habitat and farmlands on a regional scale.

**Proposed Modification (N&FL Appendix, Pg. 4)**

For the past several years, many of the SCAG region’s local governments, *public agencies* and ~~public agencies~~ *conservation groups* have taken action to conserve natural and farmlands through a number of policies and programs.

**Chapter 3: A Path to Greater Access, Mobility & Sustainability**

We hope that the Sustainable Community Strategies, specifically those listed in the Green Region, can be implemented across the Southland. The Plan’s goal is to “avoid growth in wetlands, wildlife corridors, biodiverse areas, wildfire prone areas, and flood plains” (Pg. 55). We fully support this, but remind SCAG that all of Southern California is part of the California Floristic Province—making the entire geography a “biodiverse area” that is threatened with development.

Further, many of our state and federally listed threatened and endangered species reside in our (protected and unprotected) natural areas. Decisions about what happens to the landscape (land use conversion) where these sensitive species live starts with local land use planners. Efforts are underway to list additional species on the California endangered species list, including the sub-species of mountain lion found in the Santa Ana Mountains. Without connections between open spaces, this local cougar population will face the genetic consequences of inbreeding and will



eventually the population will die out. Again, these connections between open spaces come back to land use decisions.

While we appreciate the link this plan provides between environmental mitigation and transportation planning (Pg. 58)—it is high time that all infrastructure projects provide that link. RAMPs should also be incorporated for water, electric, solar, wastewater, natural gas, and other infrastructure. All of these projects have environmental impacts. As an example, the Central Valley and Sacramento Valley RAMP Pilot Program linked both road and water projects in a RAMP. We are asking SCAG to expand the list in this section to more than just transportation projects so that the impacts of all projects are thoughtfully and comprehensively mitigated. Accordingly, we propose the following modifications:

**Proposed Modification (Plan, Pg. 58)**

Advance mitigation also benefits ~~transportation~~ *all* agencies with a more efficient permitting process, as well as reduced cost escalation and project delay. Regional advance mitigation planning takes this concept further and establishes inventories of anticipated impacts from ~~transportation~~ *infrastructure* projects across the region.

**Chapter 6: Looking Ahead**

We agree with the statement made on page 150: “Real progress can be made towards sustainable results over the next twenty-five years if cities and counties are equipped with sufficient resources and practical tools.” Unfortunately, we have found in our interactions with local cities and the County of Orange, that not only do their general plans not support this concept, but neither do the zoning codes. Further, in many instances, the planners, planning commissions, and city councils/boards of supervisors do not have a clear understanding of what “sustainable” actually means. SCAG is in a perfect position to serve as a clearinghouse for innovative policies, programs, sustainability efforts, etc., through its Toolbox Tuesday webinars or other training opportunities. As they say, “you don’t know what you don’t know.” We strongly recommend that SCAG use its regional leadership position and resources to teach, train, and educate.

**Sustainable Communities Strategy (SCS)**

We agree that development is occurring at the fringes of the urbanized region and in many instances these are places that (1) burn frequently, (2) lack appropriate infrastructure for houses, and (3) promote the single occupant vehicle habit. We suggest providing information to local cities and counties about how these fringe developments **add** GHG and VMT and that conservation of that land reduces those impacts. A landowner’s decision to sell their land for conservation supports private property rights and local control.

As it relates to the climate change issues raised (Pg. 3)—we appreciate your acknowledgement of these issues (extreme heat, sea level rise, wildfire frequency, and changing rainfall levels).

However, we are concerned at how the NIMBY (Not in my Backyard) and public opposition to projects was framed in the SCS. While we are aware that residents may oppose projects for any number of reasons, but finger pointing to NIMBYs as the problem isn’t helpful.

Trust in government is at an all-time low, and yet resident engagement is increasing. Any local opposition is tagged NIMBYism. And, the connotation behind the word “public” remains negative. Often times, residents’ main goal is to achieve a balanced policy solution to their concerns, and local activism on a controversial project should be seen as an opportunity for convening a public policy discussion on key issues. It appears that what decision makers perceive as frustration by the public is really a lack of tools deployed to resolve the issues. Training opportunities for decision makers exist that could help bridge this gap are offered by the Public Policy Institute of Pepperdine, as one example.

Further, every city in the SCAG region should have a goal to become a “responsive government” that pays attention to the residents, businesses, and visitors. Engaging the residents in goal setting is essential to creating a shared outcome that aligns the community, business, and city’s interests—a view *everyone* can support. A good public process includes not only results in a cost effective, timely, and goal-oriented process, but it also considers the culture and history of the topic. The latter seems to be consistently missing from the dialogue. Further, adhering to the policies set in the general plan or zoning code need to be followed or the expectations about a project shift based on the whim of the project applicant.

Residents, businesses, developers, decision makers, and staff all use the governing general plan as tool for understanding what is in store for the community now and in the future. This “rule book” is like a compact between developers, the local government, and residents. It sets the stage for future development and change and offers predictability. Residents often find themselves at odds with projects because developers ask for modifications to the “rule book.” In other words, what the developer wants is not what is codified in the general plan, and so they opt to change the plan—instead of changing the project. This changes the playing field for every project and makes the work that has gone into the general plan moot. Perhaps more importantly, the community’s compact with the governing agency is broken and trust can be lost.

There are many instances where we (the “public”) provide numerous solutions to the problems a particular development faces—and when it comes time to vote on a project, our leaders ignore those suggestions. If there were better training for elected officials on how to interact with the public, address concerns, and listen—many of the issues could be resolved. This type of “blind eye” mentality only perpetuates the “blame game” that public involvement is bad and only leads to opposition.

Within the “Final Growth Vision” (Pg. 22) the SCS states: “...decisions about how growth will actually occur are up to each local jurisdiction.” In other words, the cities can ignore the goals of this plan and do what they want. This is why our point about educating the local jurisdictions about opportunities related to transportation, housing, land use, and conservation are so very important. It is more difficult to ignore good policy when you understand it and its impacts.

One of the items that seems lacking from the “Protect the Environment and Conserve Natural Resources” section (Pg. 24) is that when land is consumed (converted from greenfield to urban uses), GHG emissions and VMT are increased. This should be acknowledged—or alternatively state that leaving natural lands in their existing state sequesters carbon instead of emitting carbon. We suggest the following modifications:

**Proposed Modification (SCS, Pg. 24)**

By contrast, a pattern that places a greater share of new growth in dispersed standard development patterns consumes more greenfield land. *Additionally, converting greenfield and agricultural lands typically adds GHG and VMT to the region.*

We support the approach to this plan to avoid high hazard areas for wildland fires, sea level rise, flooding, etc. The less we build in those locations, the less we have to defend them and rebuild them in the future.

Within the “Promote a Green Region” (Pg. 27), “reducing consumption of resource areas, including agricultural areas” does not actually protect the land. The conservation mechanism is missing.

**Proposed Policy Modification (SCS, Pg. 27)**

*“Protect ~~Reducing consumption of~~ resource areas, including agricultural land.”*

This gets at the same intent (not converting it to urban uses), but actually takes the step forward of protecting it so the possibility of future potential conversions never has to happen again.

Page 29 covers the “Tools” that can be used to help with sustainable placemaking, specifically urban heat island reduction. This component easily benefits disadvantaged communities throughout the Southland and should be incorporated as a tool for the Environmental Justice Appendix. Inclusion of trees makes urban areas cooler, provides more shade for those on bike or foot, improves the sense of community, and cleans the air.

FHBP supports, in full, the absolute constraint (Pg. 32) that growth cannot or should not occur in existing open spaces or on conserved land. We would urge that easement lands and mitigation sites also get included in this list. As for the variable constraints, we agree with this list as well—especially the inclusion of wildland-urban interface and wildfire prone areas (Calfire Very High Fire Severity Zones).

**Proposed Policy Modification (SCS, Pg. 32)**

- *Conserved and easement lands, as well as mitigation sites*

On Page 33, the list of Data and GIS Maps referenced in this document are helpful. We’d offer the California Conservation Easement Database (CCED) as a future tool. It can be found at: <https://www.calands.org/cced/>.

## Demographics and Growth Forecast Appendix

Within the Demographics and Growth Forecast Appendix, it states:

“Following public input and SCAG’s analysis of the GHG/VMT benefits of the alternative scenarios, a preferred growth forecast scenario was chosen which prioritizes

growth in areas such as job centers and transit priority areas which have regional transportation benefits. (see **EXHIBITS 1-9**.)”

Exhibits 1-9 appear in conflict with the description of the “absolute constraints.” For example, the absolute constraint of not building in existing open spaces or on conserved lands (as described in the SCS, Pg. 32) conflicts with the growth forecast areas. We recognize these growth forecasts were built using the transportation area zones (TAZ) and those zones that do not necessarily align with boundaries of conserved lands, but, these maps provide a false projection of growth in the region and within specific TAZs. The map should depict what is and is not an area of absolute constraint to align with what has been stated previously about where growth can and cannot occur.

## Natural & Farmlands Appendix

### Vision

FHBP supports the inclusion of natural and farmland preservation as a tool to reduce GHG and VMT. However, we are concerned that the goal of “Promote conservation of natural and agricultural lands and restoration of habitats” lacks the specific actions needed to actually conserve land. We suggest an action-oriented emphasis like “conserve” or “partner to conserve...” as follows:

#### **Proposed Modification (N&FL Appendix, Pg. 2)**

~~“Promote conservation of~~ *Conserve* natural and agricultural lands and ~~restoration of~~ habitats.”

#### **Proposed Modification (Plan, Pg. 9)**

~~“Promote conservation of~~ *Conserve* natural and agricultural lands and ~~restoration of~~ habitats.”

Further, FHBP just completed a yearlong study of restoration projects and their rate of success or failure. What we found was that most projects struggled to meet the mitigation measure requirements necessary under the California Environmental Quality Act (CEQA). In several instances (Pg. 2 & 11), the Appendix mentions removing non-native plants. Our study shows that this goal was part of the restoration project too, but the non-native seed bank was able to outcompete the native plants and dominate the landscape after the restoration. So, while improving habitats through removal of non-native plants is a commendable goal, it can be difficult for some to achieve without the proper site preparation, funding, experience, long-term stewardship, etc. Since restoration is a possible focus of this policy, we encourage SCAG to review the information and recommendations from our study. It can be accessed at: <https://www.fhbp.org/resources/studies-reports/ceqa-mitigation-study/>.

### Policy & Regulatory Framework

As noted previously under Chapter 2 (the Plan), it is not prudent to rely on cities and counties (1) to protect our natural lands, or (2) to develop plans and policies to conserve them. Specific actions must be taken to ensure the preservation happens in perpetuity—acquisition and

ownership by a park/non-profit, a conservation or agricultural easement, or enrollment in a Conservation Plan.

### **Regional Conservation Approach**

De-emphasizing growth in wetlands, wildlife corridors, and wildfire prone areas is a great step in identifying areas of regional importance. SCAG should consider supporting local, regional, and statewide efforts already underway in the conservation arena—especially where broad coalitions already exist. Along these lines, we suggest the following modification:

#### **Proposed Modification (Plan, Pg. 9)**

“To further prioritize natural habitat areas and avoid impacts to the environment, Connect SoCal will seek to deemphasize growth in wetlands, wildlife corridors, high-biodiversity areas, wildfire prone areas, and floodplains. *Aligning SCAG’s role and support with those of local, regional, and statewide conservation efforts is another opportunity.* This approach intends to focus regional growth in existing communities, and reflects various goals of the plan such as adapting to a changing climate and promoting conservation of agriculture and natural lands.”

For example, the Coast to Cleveland Connection focuses on connecting the 22,000+ acres of the Laguna Coast to the Santa Ana Mountains. Efforts are underway with the resource agencies, cities, transportation agencies, non-profits, and park managers to make this happen. When these partnerships are available, SCAG should support them.

Another example is the Hillside Open Space and Education Coalition, which, in 2004, united the cities of Brea, La Habra, La Habra Heights, and Whittier and the unincorporated communities of Hacienda Heights and Rowland Heights. The goal was to seek ways to preserve strategic hillside parcels in the Puente-Chino Hills and to mobilize public resources to preserve and acquire the parcels threatened by development. This Coalition is working with State Parks, local cities, residents, and non-profits. Again, this is another opportunity to support an existing effort—if and when the need arises.

### **Conservation Policies and Programs in the SCAG Region**

We were pleased to see the addition of Agrihoods, the Liberty Canyon Wildlife Crossing, and Ventura County Habitat Connectivity and Wildlife Corridor Ordinance in the lineup of new activities being undertaken in the SCAG region.

For the Orange County Transportation *Authority* (not *Association* as listed on Pg. 14 of the N&FL Appendix), it may be helpful to provide context that the funding available in the Environmental Mitigation Program is five percent of the freeway revenues, which in 2005 dollars was \$243.5 million.

#### **Proposed Modification (Plan, Pg. 9)**

“Thirty million dollars for approximately 1,300 acres of land and \$10 million on 350 acres of habitat restoration have been funded through Measure M2. *The Measure provides five percent (\$243.5M in 2005 dollars) of the freeway revenues to fund this program.*”

On Page 16 the first paragraph indicates there are five adopted major conservation plans, but actually demonstrates in the text there are six. This should be corrected as follows:

**Proposed Modification (N&FL Appendix, Pg. 16)**

“Currently, there are ~~five~~ *six* adopted major conservation plans made up of multiple jurisdictions within SCAG’s boundaries (**EXHIBIT 5**).”

Within the OCTA Measure M2 NCCP/HCP, there have actually been 12 restoration projects funded. The addition of dam removal projects within the Cleveland National Forest were approved by OCTA’s Environmental Oversight Committee in May 2016 and the full OCTA board in February 2017.

**Proposed Modification (N&FL Appendix, Pg. 16)**

“Since the initial funding round in 2010, 1,300 acres of natural lands have been acquired and ~~eleven~~ *twelve* restoration projects have been funded.”

Exhibit 5 fails to include the Southern HCP in Orange County. Since the OCTA Plan overlays the entirety of both the Central-Coastal and Southern Plans, it may be helpful to have the OCTA plan displayed in a patterned texture on top of the other Orange County plans.

**Opportunities**

We are pleased to see the inclusion of an opportunities section within the Appendix (Pg. 18). However, we’d like to see this section expanded to more than just the Greenhouse Gas Reduction Fund (GGRF) Resources—there are many other tools, strategies, and techniques that can be utilized to conserve natural lands and simultaneously reduce GHG and VMT. Some other funding sources to conserve natural lands are listed in the Environmental Coalition letter to be submitted January 23, 2020.

Additionally, FHBP completed a study of innovative ways to link housing, transportation, and conservation through policies and funding mechanisms. This study is available for download at: <https://www.fhbp.org/resources/studies-reports/healthy-communities-toolkit/>.

The tools mentioned include items such as:

- Urban Growth Boundaries
- Crowdfunding
- Social Impact Bonds
- Real Estate Transfer Fees
- Community Benefit Fees
- Landfill Tipping Fees
- Differential Development Fees

We recommend extending past the GGRF as the only listed source to support the conservation of natural resources—as there are many others that currently exist at the local, regional, state, and federal level.

### Recommended Policies

We have been a supporter of SCAG and its efforts to include natural land preservation in the RTP/SCS. However, we were disappointed to see that of the 10 policies recommended in the Natural and Farmlands Appendix all 10 policies were replicated word for word from the 2016 Appendix. It is as if no further thought into how the natural world has changed or where the locations of intense development pressure now exist. In the four years since the last plan, new policy recommendations could have been created and incorporated. New policies could be pulled from the list above described in the Opportunities section. We recognize that there may be an internal issue with adding “new” policies in an appendix that aren’t captured in the RTP or SCS itself. One solution to this is to rename the section “Strategies” because what is included in the list are actually implementation strategies for achieving a reduction in GHG and VMT using land conservation and restoration as a tool.

### Next Steps

Of the five “Next Steps” described in the Appendix, three of them were from the 2016 plan. The only creative next step is the development of the regional greenprint, as SCAG is already engaging stakeholders via the Working Group. What we would have expected from the Next Steps section is a forward advancement of the 2016 activities. Our suggestions are below.

“Encourage Advance Mitigation Programs” could have forward motion by:

- Identifying infrastructure agencies about to adopt major programs/policies that could incorporate these advance mitigation programs.
- Working to retroactively adopt mitigation programs or policies within existing transportation measures.

“Align with Funding Opportunities and Pilot Programs” could have forward motion by:

- Assisting local agencies with tax increment financing measures that include conservation and parks as a key goal.
- Apply for state or federal conservation funding to complete projects of regional and/or statewide significance.
- Launch a pilot program that advances sustainable activities like water quality improvements, natural land acquisition, agricultural easement purchases, or restoration project implementation.
- Feature conservation funding in a Toolbox Tuesday for how local jurisdictions and/or non-profits can fund local projects.

“Provide Incentives for Jurisdictions to Work Across County Lines” could have forward motion by:

- Engaging with cross-jurisdictional conservation alliances to add support, value, and funding to the effort.
- Focus SCAG grants on conservation projects of regional significance as a tool for connecting habitat lands together cross-jurisdictionally.
- Identify locations where cross-jurisdictional alliances should exist and bring the parties together.

Thank you for the opportunity to comment the Connect SoCal documents. We hope our feedback is constructive and helps SCAG achieve its overarching goal of 714-964-0516.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Wellborn".

Michael Wellborn  
President





January 20, 2020

Dear Connect SoCal Team:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) (collectively called Connect SoCal). In 2012, with release of the prior RTP/SCS, Friends of Harbors, Beaches and Parks coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, Sierra Club's Hobo Aliso Task Force is now a part of this growing coalition in 2020.

The Hobo Aliso Task Force works in Orange County and has since 2001. Our mission is to protect and preserve finite natural resources and uphold the Coastal Act and other applicable laws and policies that support our mission. We have had important successes since our inception including saving many acres of land from develop, protecting and preserving ESHA and endangered species from poorly planned fuel modification, and implementing crucial restoration projects to bolster the biodiversity in areas that are considered hot spots.

We offer the following comments on the Natural and Farmland policy, goals, and next steps.

We are pleased to see conservation of our natural and agricultural lands as one of the 10 main policies of Connect SoCal. Land preservation that not only reduces greenhouse gas (GHG) emissions, but also sequesters carbon. Any investment in habitat restoration improves this sequestration potential as well. When land is left in its natural state, no new "vehicle miles travelled" are added to the region's transportation system. We believe including land conservation is a step in the right direction. SCAG has demonstrated that Metropolitan Planning Organizations can play a vital, thoughtful, and science-based role in mitigating impacts to our natural environment from transportation, infrastructure, and other development projects. By incorporating natural and farmlands protection strategies into your policy document, we believe the many benefits of this broad-based conservation approach will be realized sooner than expected. Thank you for your leadership.

Our organization supports the idea that as new growth occurs it should be focused in existing city-centers and near transit. When developments are built in the city center, it relieves pressure from the fringe.

However, the Plan fails to outline exactly how (or with what conservation mechanism) these fringe lands (or any lands) will actually be protected. Just because the pressure is relieved by focusing development elsewhere, doesn't mean the land then automatically becomes protected. We know this is a fact due to multiple experiences our organization has experienced. Numerous organizations, ours included, focus our work on protecting important habitat lands. A lot of time, energy, money, strategy, and political will are combined to create a successful conservation transaction that lead to permanently conserved lands. And once the land is conserved, it needs care and attention, AND ongoing protection. Further, just because local agencies may be contributing to the conservation arena, in no way should you discount the roles of the conservation non-profit community. In short, SCAG must identify the actual mechanism, process or plan on how the greenfields and agricultural lands will be protected.

Many of the benefits of open space and parkland have been outlined in the Plan and Natural Lands Appendix. In addition, there are many economic benefits of open space. These are realized through increased property values, ecosystem services, support of local businesses through park visitor purchases, and a reduction in the urban heat island effect. Further, conservation of natural lands has many on-the-ground co-benefits like access to recreational opportunities, preservation of important habitats and species, protection of cultural and archeological sites, increased job opportunities, protection of threatened/endangered species, and environmental education experiences. Our natural lands also filter water, clean the air, and provide homes for wildlife. Natural lands preservation also protects our watersheds, rivers, and water sources. Voters consistently support measures that benefit their local water resources. And last, but not least, our future generations must not be forgotten – they too must have open space and parkland. Our children have taken to the streets to let adults know how much they care about the planet, we must support them and make sure we are doing our very best to protect and preserve our finite natural resources.

The Plan outlines that the region anticipates an additional 3.8 million people by 2045 providing increased pressure to our existing parkland. Existing studies document that many communities in the Southern California region already do not have enough parkland as outlined by the Quimby Act (five acres per 1000 residents). As cities grow, more parks and more park access will be needed. What is the mechanism for this? Additionally, and more importantly, these city parks are fundamentally different than habitat-focused parks. Usually city and regional parks include high intensity activities, like turfed soccer and baseball fields. The types of land acquired as mitigation or through local conservation efforts typically focus on preservation of natural habitat and less intensive uses (birding, hiking, etc.). In fact, many of these mitigation lands have limited or managed public access. Providing “more” access to either high or low intensity parks and/or habitat lands may have significant consequences for the land manager. How additional access will be provided should be addressed, as well as how additional lands will actually be preserved.

Wildlife corridors are getting more and more attention these days. Ensuring survival of the top predator and the suite of species in the ecosystem means our natural lands must also maintain environmental functions, be sustainable over the long term, and include plans for long-term stewardship. The issue is that many housing and transportation projects eliminate the wildlife movement corridors and fragment the landscapes into smaller, less viable pieces of land, or they completely ignore the need for these corridors. Ensuring our open spaces are connected to one another is essential for species survival. Wildlife corridors allow landscapes to maintain ecological functions, allow places for regeneration after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan would be stronger if it supported the enhancement of and/or protection of documented wildlife corridors prior to commencing impactful projects.

1

Many non-profits are working to ensure additional bays, estuaries, wetlands, bluffs, and beaches are preserved forever. Additionally, one way our coasts are connected to inland areas are through our rivers and streams. These riparian areas serve as recreational trail corridors, water recharge and infiltration locations, and serve as places our wildlife use for watering sources. However, transportation and land use generated urban runoff are still problems. Our beaches and coastline are inundated with pollution, and a 303(d) listing is simply not acceptable, and can be prevented. Litter, debris, and pollutants should be decreased prior to reaching the coast. Ensuring everyone has a positive experience on the sand and in the surf should be our goal and is our collective responsibility, but we need to address Southern California's trash and contaminants problem.

One key way to improve the environment is through restoration projects. Our organization works very hard at finding creative ways to fund and maintain restoration projects. These can be on land, in riparian areas, on the beach, as well as in the ocean. Restoration provides benefits by adding native plants, removing the non-native plants and their seedbank, as well as increasing carbon storage, and providing improved habitats for our wildlife. Our environment benefits from these improvements, as do our watersheds, our air, and our communities. Having improved habitats means that our water is cleaner, our soils won't erode as easily, it creates jobs for local residents, and our unique biodiversity is maintained. Further, the many endemic and threatened/endangered plants and animals benefit from these restoration projects as well. Thank you for including restoration as a key component in the natural lands and agricultural policy.

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix. Should you need to contact me, I can be reached at . In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to

Sincerely,

A handwritten signature in cursive script that reads "Penny Elia".

Penny Elia  
Task Force Chair  
Save Hobo Aliso Task Force  
Sierra Club

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**P.O. Box 54132**  
**Irvine, CA 92619-4132**

**California Cultural Resource Preservation Alliance, Inc.**  
An alliance of American Indian and scientific communities working for  
the preservation of archaeological sites and other cultural resources.

Dear Connect SoCal Team:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) (collectively called Connect SoCal). In 2012, with release of the prior RTP/SCS, Friends of Harbors, Beaches and Parks coordinated a cross-county regional conservation coalition focused on the inclusion of natural lands mitigation and policies within that SCAG plan. Our organization, California Cultural Resource Preservation Alliance, Inc. (CCRPA), is now a part of this growing coalition in 2020.

CCRPA works in Los Angeles and Orange counties and has since 1998. Our mission is to protect and preserve cultural resources such as sacred sites, archaeological sites, historic sites, and Traditional Cultural Places in Southern California with a focus on Orange and Los Angeles Counties. Preservation of natural and farmland results in the preservation of these cultural resources. We have had important successes since our inception including the preservation of the 100-acre, 7,000-year-old Tomato Springs site in east Irvine.

We offer the following comments on the Natural and Farmland policy, goals, and next steps.

Many of the benefits of open space and parkland have been outlined in the Plan and Natural Lands Appendix. We wish to make sure that the protection of cultural resources is not overlooked. It has been estimated that 90% of archaeological sites in southern California have been destroyed to make way for development. We strongly support the preservation of open space as the means of protecting the remaining cultural and archaeological sites that are an important part of our national patrimony. In addition, there are many economic benefits of open space. These are realized through increased property values, ecosystem services, support of local businesses through park visitor purchases, and a reduction in the urban heat island effect. Further, conservation of natural lands has many on-the-ground co-benefits like access to recreational opportunities, preservation of important habitats and species, increased job opportunities, protection of threatened/endangered species, and environmental education experiences. Our natural lands also filter water, clean the air, and provide homes for wildlife. Natural lands preservation also protects our watersheds, rivers, and water sources. Voters consistently support measures that benefit their local water resources.

The plan outlines that the region anticipates and additional 3.8 million people by 2045 providing increased pressure to our existing parkland. Existing studies document that many communities in the Southern California region already do not have enough parkland as outlined by the Quimby Act (five acres per 1000 residents). As cities grow, more parks and more park access will be needed. What is the



ORG-18

**P.O. Box 54132**  
**Irvine, CA 92619-4132**

**California Cultural Resource Preservation Alliance, Inc.**  
An alliance of American Indian and scientific communities working for  
the preservation of archaeological sites and other cultural resources.

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mechanism for this? Additionally, and more importantly, these city parks are fundamentally different than habitat-focused parks. Usually city and regional parks include high intensity activities, like turfed soccer and baseball fields. The types of land acquired as mitigation or through local conservation efforts typically focus on preservation of natural habitat and less intensive uses (birding, hiking, etc.). In fact, many of these mitigation lands have limited or managed public access. Providing “more” access to either high or low intensity parks and/or habitat lands may have significant consequences for the land manager. How additional access will be provided should be addressed, as well as how additional lands will actually be preserved.

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Wildlife corridors are getting more and more attention these days. Ensuring survival of the top predator and the suite of species in the ecosystem means our natural lands must also maintain environmental functions, be sustainable over the long term, and include plans for long term stewardship. The issue is that many housing and transportation projects eliminate the wildlife movement corridors and fragment the landscapes into smaller, less viable pieces of land. Ensuring our open spaces are connected to one another is essential for species survival. Wildlife corridors allow landscapes to maintain ecological functions, allow places for regeneration after natural disasters such as fire, flood or landslide, and improve the resiliency in the face of climate change impacts. The Plan would be stronger if it supported the enhancement of and/or protection of documented wildlife corridors *prior to commencing* impactful projects.

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Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this Plan, especially as it relates to the conservation policy and Natural and Farmlands Appendix. Should you need to contact me, I can be reached at 949 559-6490. In addition, we request to be included on any notifications (electronic or otherwise) about this policy’s creation and implementation, please send information to p.martz@cox.net.

Sincerely,

Patricia Martz, Ph.D.  
President, California Cultural Resources Preservation Alliance, Inc.

**From:** [Marven Norman](#)  
**To:** [2020 PEIR](#)  
**Subject:** Comments  
**Date:** Friday, January 24, 2020 1:28:54 PM  
**Attachments:** [Connect SoCal - Google Docs.pdf](#)

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Please find attached my comments on the Connect SoCal PEIR.

Cheers

**Connect SoCal Plan**

- Page 9: The Goals need to be re-ordered. It would be great for current #6 to move to the top spot and #1 to move down quite a bit.
- Page 129: Outcome 2 lacks measures for active transportation delay.
- Page 138: plan has too much business-as-usual to reasonably expect to meet GHG Emissions Reduction targets and electrification shouldn't be seen as the magical panacea that will waltz into town over the next decade to cure the problem of relying too much on cars.

**Active Transportation Appendix**

- Page 8: There might be decisions to be made about phasing as we retrofit the legacy of the existing environment, but the expectation needs to be that bicycle and pedestrian infrastructure will be at a minimum, built everywhere roads are paved.
- Page 13: Gentrification concerns are real, but they arise due to an absolute dearth of quality active transportation infrastructure in essentially the entire SCAG region. Thus, the construction of any amenities are unfortunately also going to be likely to attract people who can afford to spend more on housing and to the extent that it also allows them to reduce car use and free up household cashflow, that can find its way into the local economy, giving it a boost. However, especially given the safety issues, we cannot let fears of gentrification dominate the ability to provide safety improvements via improved bicycle and pedestrian infrastructure and indeed, research by Lusk et al. has identified that residents of lower-income communities are still quite interested in high-quality bike facilities.<sup>1</sup> Instead, it makes it even more important to make them basic expectations by including them in all standard plans for new build and refurbishments as well as prioritizing expanding the networks of the provisions as fast as possible to lessen the potential for any one neighborhood or community bearing the brunt of the changes in a particular area.
- Page 14
  - GoHuman is an invaluable tool for improving Public Opinion and should receive more funding to be able to do more events to help showcase both short-term and more permanent investments. However, as mentioned in the comments on gentrification, there is a need to move beyond small pilots both to avoid gentrification concerns as well as to maximize the potential by way of expanding improvements to be within reach of more communities.
  - Given the lack of funding, what is available needs to be directed to where it will provide the maximum impact. That makes it absolutely essential to provide best practice accommodation for bicyclists and pedestrians in standards to make them a routine part of ongoing projects. That also could help address Public Opinion by changing the framing of the situation. There will not be controversy at all over something that has existed from the beginning.

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<sup>1</sup> Lusk et al. (2017). Biking practices and preferences in a lower income, primarily minority neighborhood: Learning what residents want.



- Page 24: Cost Assumptions & Mode Shift should look at national and international guidance and experiences as well as take a clear-eyed approach to the topic. Many of the current bike facilities in the region are simply not on par with best practices of even yesteryear in places that have substantially more ridership. In addition, a number of studies have identified the potential improvements that would come from including world-class infrastructure, particularly when done to form entire networks to connect to destinations and transit.<sup>23</sup> That literature should be reviewed to identify the true potential for better investments based on the completeness of networks (including by filling in critical gaps) and by building the infrastructure itself to higher standards (e.g. a six-foot bike lane next to a multilane arterial is NOT best-practice).
- Page 31: As noted above, additional research by Lusk et al. has identified that there is great interest for improved bike facilities in low(er)-income communities, the same communities that Connect SoCal already notes are more likely to have people biking even as they're also less safe. These facts should be leaned on more heavily, not in a patronizing way, but to impart the importance of making the changes necessary to support riders. That ultimately is a point directly related to the next section on Environmental Justice.
- Page 44: A discussion about Class III bikeways being part of the total needs to be had because the classification is too ambiguous and a number of jurisdictions simply use it as an excuse to not do anything meaningful and they remain high-stress environments under the LTS system developed by Furth referenced elsewhere in the document.
- Page 51: Broadly speaking, micromobility is best served by what is traditionally known as bike infrastructure. However, legal definitions mean that use by those modes is technically illegal because certain facilities are defined as being for the exclusive use of bicycles. Nevertheless, the bike facilities are still the best place for most of them to be used, but they do underscore the importance of adequate designs for bikeways, something which has not necessarily been anywhere close to truly taken to heart in the region in all but a scant few projects.
- Page 59: It's encouraging to see that the Local Bikeway Infrastructure component recognizes that big changes will be necessary in some areas and the four Strategies listed will if followed, all be influential in creating the positive changes necessary. However, an additional Strategy is needed to ensure that any and all new-build developments are built to avoid the need for retrofits in the first place. Such a Strategy needs to emphasize providing direct connections to transit, including with parking at transit stops and stations, and local destinations as well as laying out an integrated network as part of the initial planning and design of **all** greenfield and large-scale brown-/greyfield projects in the region.
- Page 60: Though called "first-last mile," it should be acknowledged that with bikes and especially e-mobility devices, that distance can reasonably and easily be extended to be several miles. Thus, it would be helpful to identify a FLM Infrastructure Strategy to target

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<sup>2</sup> Lowry, Furth, & Hadden-Loh. (2016). Prioritizing new bicycle facilities to improve low-stress network connectivity.

<sup>3</sup> Karens. (2007). Promoting bike-and-ride: The Dutch experience.

bike infrastructure to an increased radius around stations beyond a single mile and place priority on making sure it offers users as few necessary stops as possible.

- Page 63: Complete Streets Strategies need to place a focus on making sure that the plans include defined and recognized low-stress facilities and networks.
- Page 69: Table 11 lists changes under Connect SoCal that are appallingly anemic. Research from London's work shows that even in suburban areas, changes can have broad impacts and substantially increase walking and biking.<sup>4</sup>
- Page 82: Table 12, Colton has completed their ATP.

#### Aviation and Airport Ground Access Appendix

- Page 8: Section about KONT trails off mid-sentence.
- Page 34: There are additional opportunities to provide rail access to KONT that merit serious consideration. Those are described in my comments on the Passenger Rail Appendix below.

#### Highways & Arterials Appendix

- Page 13: The regional express/HOT lane network is pathetically inadequate at present and the plans fall FAR short of what is needed. **Every** single limited-access highway in the entire region that has more than two travel lanes per direction should *immediately* have at least one (but preferably two if available) of the additional lanes **converted** to be HOT lanes, with the revenue being reinvested into maintenance needs, active transportation infrastructure, and transit service in the corridors. Doing so would be the single-most cost-effective measure possible to dramatically improve the congestion issues in the region while also greatly expanding the options available to people by filling critical funding gaps that currently exist for active transportation, transit, and even arterial/highway investments.
- Pages 17 & 18: Performance results need to include delay incurred by bicyclists and pedestrians, particularly the impact that signal timing issues have on the latter group.

#### Passenger Rail Appendix

- Page 7: The Thruway services mentioned in the Pacific Surfliner subsection can now (or will soon be possible to) be booked as standalone trips without a linking rail segment thanks to SB742 which Gov. Newsom signed into law last year.
- Page 12: Metrolink should work with local partners to improve the bike parking at its stations.
- Page 20: SCRRA section notes that "VCTC has one votes" which should presumably be singular.
- Page 24: The segment on the Metrolink San Bernardino Line is also true for the Metrolink Inland Empire/Orange County Line, so it should be mentioned as well.

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<sup>4</sup> Alred, Croft, & Goodman. (2019). Impacts of an active travel intervention with a cycling focus in a suburban context: One-year findings from an evaluation of London's in-progress mini-Hollands programme.

- Page 27: Discussion of Los Angeles to Coachella Valley service needs to include planning to bridge the gap between the tracks into Redlands which will soon host Redlands Rail and the UP Yuma Subdivision. Doing so would allow passenger service from LA to the Coachella Valley to serve both Riverside *and* San Bernardino via the same trains as well as provide more direct service directly into LA via the agency-owned tracks of the San Bernardino Line. The most logical place to do so is likely along California Ave. on the border between Loma Linda and Redlands. The inclusion of a station in the vicinity of the Barton Rd./CA Ave. intersection would provide easy access to the community and be a valuable point for extending Omnitrans' sbX Green Line service from its current terminus at the VA hospital in Loma Linda, serving daily commuters traveling to Loma Linda University's campuses as well as into Redlands via the existing fixed-route services. This is an urgent and critical gap to fill to vastly improve transit service in the entirety of the SCAG region and beyond as it would be a natural part of the Southwest High-Speed Rail Network discussed on Page 28. Also, service beyond Indio into Imperial County should be considered. The new DMU options that are now available make it more realistic to serve that market and provide service all the way to Calexico using the existing right-of-way. UP will undoubtedly be a significant barrier and their single-tracked corridor of the Yuma Subdivision from east of Indio will be a problem for many opportunities to improve transit throughout the SCAG region, so a plan should be made to at a minimum, provide additional sidings and double-track through that area to mitigate their concerns.
- Page 28: Southwest High-Speed Rail Network would derive immense benefit from a "California Connector" to be constructed on the Loma Linda/Redlands border to bridge the gap between the UP Yuma Subdivision and the agency-owned tracks approximately a mile north which would provide expedited services and transfer opportunities to LA, Riverside, San Bernardino, and beyond.
- Page 34: There is an opportunity directly east of Ontario Airport to provide a rail connection along Haven Ave. that would link the UP Alhambra Subdivision to the UP Los Angeles Subdivision. That would enable a reroute of the Riverside Line trains over that alignment and provide comparatively immediate relief to the current lack of any direct rail connection at the airport. It would also present the ability to provide residents living in downtown Ontario daily Metrolink service, a connection which they currently lack. Doing so would support the Transformative Communities grant that the City already received and is implementing by adding additional high-quality transit service. However, in the longer-term, rail service to ONT would be best provided by an entirely new Metrolink line. This San Gabriel Valley/KONT Line would leverage public investments in the Alameda Corridor-East program to provide a competitive running time for the service. An ideal routing would be via the UP Alhambra Subdivision with stops at the USC Keck School of Medicine Hospital complex, El Monte, which would provide transfer opportunities to the Metrolink San Bernardino Line, a Cal Poly Pomona station, Downtown Pomona, Downtown Ontario, and Ontario Airport. From there, the first option would be to continue to Riverside and on to Perris, but a second option would be to route some trains north to the existing San Bernardino Line tracks via either an existing

siding by the Fontana Speedway, the UP Palmdale Subdivision, or the BNSF San Bernardino Subdivision through Colton. Exactly which of those three options is the best would be determined via further study, though it's perhaps worth noting that the latter option means that there could be another station that could be added in Colton.

- Exhibit 3: The marker for improvement #5 from Table 3 is misidentified as improvement #8 and nothing identifies the marker for improvement #8.
- Page 44: The opportunities for filling gaps and providing new service identified above would presumably need to be studied, but that should be done with haste.

Albert Perdon – Email

The following input is provided for inclusion in the public comments on the 2020 PEIR. SCAG has not sufficiently analyzed or documented the environmental impacts that will result from adoption of the current draft Program Environmental Impact Report (DRAFT) for the "Connect SoCal" 2020-2045 RTP (Regional Transportation Plan/Sustainable Communities Strategy).

The reason is, the DRAFT does not take into adequate consideration the impacts that will result, both within and outside of SCAG's geographic boundaries, from implementation of the 2008 Proposition 1A bond (BOND) measure approved or not opposed by 74% of eligible voters. This measure and the law (LAW) it enacted mandates (1) quick construction of an 800-mile high-speed train (HST) system from Sacramento to San Diego and to San Francisco/Oakland, connecting and serving up to 24 new very high-density and largely auto-free new and improved cities (NEW CITIES) that are required to be planned, built and partially funded by the up to 24 NEW CITIES in coordination with the California High Speed Rail Authority, and (2) improvements to HST-connected transit systems and services of the CITIES, as defined in the LAW.

SCAG cannot use as an excuse for skirting the requirements of CEQA/NEPA, that the cities, not SCAG, are responsible for and have exclusive authority over controlling land use. Exclusive land use authority within the HST station influence areas of the CITIES is overridden by the LAW



**Henry Fung**

Include consideration of intercity bus, similar to passenger rail, as a mitigation of aviation impacts (i.e., Flyaway Bus to LAX, intercity bus for medium distance trips like Los Angeles to Fresno or Las Vegas).

1

Discuss changes necessary to incorporate increases in density and shifts in growth after adoption of final RHNA and Housing Elements. What amendments are projected to the PEIR?

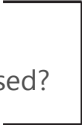
2





**Jordan Sisson**

When will the program EIR be released?



1



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January 3, 2020

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**Re: THE 2020-2045 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY OF THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENT PROGRAM ENVIRONMENTAL IMPACT REPORT**

Thank you for the opportunity to comment on the *SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Environmental Impact Report*. The Plan states as its goals:

1. *Encourage regional economic prosperity and global competitiveness*
2. *Improve mobility, accessibility, reliability, and travel safety for people and goods*
3. *Enhance the preservation, security, and resilience of the regional transportation system*
4. *Increase person and goods movement and travel choices within the transportation system*
5. *Reduce greenhouse gas emissions and improve air quality*
6. **Support healthy and equitable communities**
7. *Adapt to a changing climate and support an integrated regional development pattern and transportation network*
8. *Leverage new transportation technologies and data-driven solutions that result in more efficient travel*
9. *Encourage development of diverse housing types in areas that are supported by multiple transportation options*
10. *Promote conservation of natural and agricultural lands and restoration of habitats*

While I agree that supporting healthy and equitable communities for all residents is an admirable goal, the Plan, does not address the possible or probable denigration of the quality of life for the residents of San Marino due to increased traffic.

The stated environmental impact thresholds of significance include the following criteria and defers to **local jurisdiction**.

### 3.17.3 ENVIRONMENTAL IMPACTS

#### 3.17.3.1 Thresholds of Significance

*The impacts related to transportation, traffic and safety resulting from the implementation of the proposed project would be considered significant if they would exceed the following significance criteria, in accordance with Appendix G of the State CEQA Guidelines:*

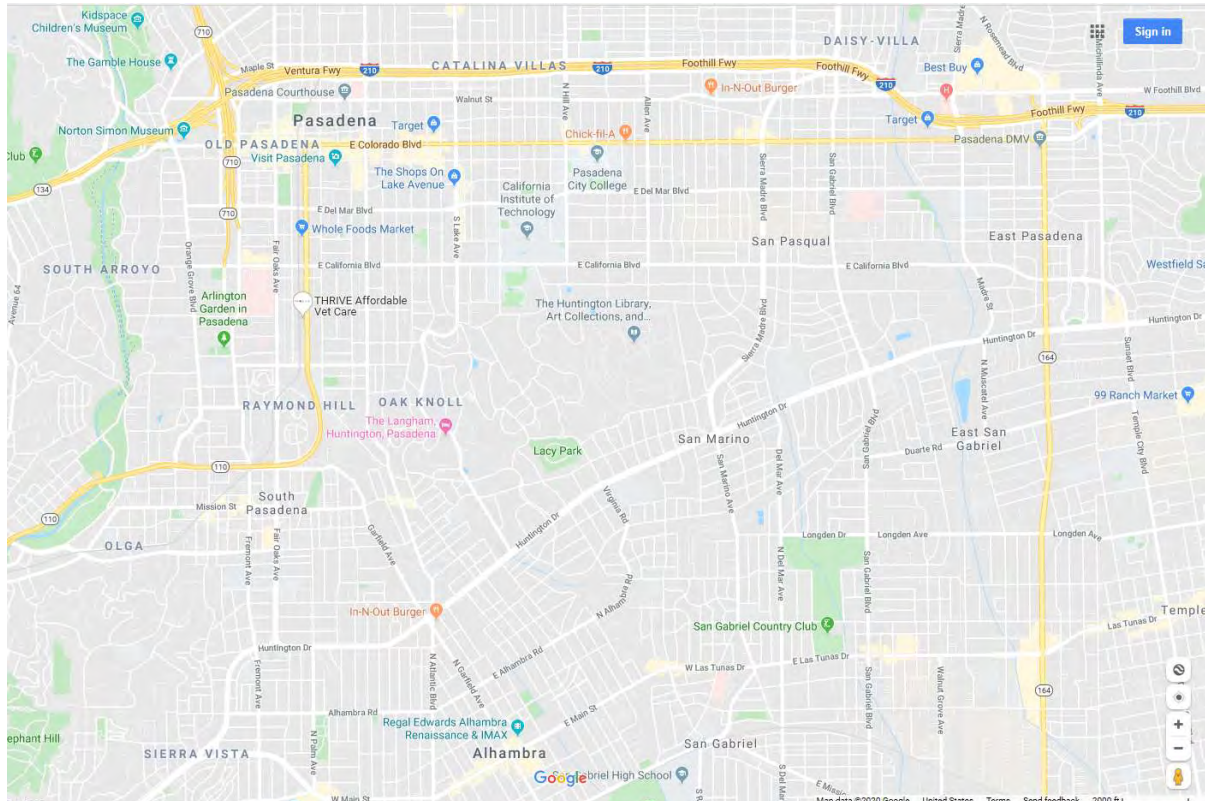
- **Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.**
- *Conflict or be inconsistent with CEQA Guidelines section 15064.3(b).*
- *Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).*
- *Result in inadequate emergency access.*

## Planned Projects

1. There is one project located in the City of San Marino. The objective of this project is to increase traffic flow on Huntington Drive, Sierra Madre Boulevard and San Gabriel Boulevard in a residential area. We object to this project based upon its stated objective.

LOS ANGELES, LOCAL HIGHWAY, LAF7119, 1AL04, 0, \$1,445,000

**HUNTINGTON DRIVE MULTIMODAL CAPACITY ENHANCEMENTS: (1) CONSTRUCT A SECOND LEFT-TURN LANE AT THE 2 INTERSECTIONS AT SAN MARINO AV AND AT SAN GRABIEL BL (EASTBOUND ON HUNTINGTON DR AND NORTHBOUND ON SAN MARINO AV AND SAN GABRIEL BL) TO INCREASE CAPACITY AND TRAFFIC FLOW. (2) MODIFIES SIGNAL TIMING TO SHORTEN THE LEFT-TURN MOVEMENT ON HUNTINGTON DR. (3) EXTENDS SIDEWALKS AND ENHANCE PEDESTRIAN FACILITIES.**



3

2. The Technical Report for Highways and Arterials describes Adaptive Traffic Control Systems:

### *TECHNICAL REPORT HIGHWAYS AND ARTERIALS*

*ADAPTIVE TRAFFIC CONTROL SYSTEMS According to the AASHTO Sustainability Peer Exchange Briefing Paper (2009), Caltrans implemented Adaptive Traffic Control Systems (ATCSs) on seven corridors in Los Angeles County as a demonstration project. **Traffic signal systems that respond in real-time to changes in traffic patterns are known as “adaptive.” ATCSs continuously detect vehicular traffic volume, compute “optimal” signal timings based on detected volume and simultaneously implement them. Reacting to these volume variations generally results in reduced delays, shorter queues and decreased travel times. ATCSs are designed to overcome the limitations of pre-timed control and respond to changes in traffic flow by adjusting signal timings in accordance with fluctuations in traffic demand. The purpose of Caltrans’ demonstration project is to deploy and evaluate the effectiveness of the future ATCS on the State arterial street network that experiences both***

4

*recurrent and non-recurrent delay. The ATCS system was shown to reduce travel time by 12.7 percent, reduce average stops by 31 percent, and decrease average delays by 21.4 percent*

The following project is planned for South Pasadena. We object to this project based upon its functionality and objective of increasing traffic flow.

11TS04

*SOUTH PASADENA'S ATMS, CENTRAL TCS AND FOIC FOR FAIR OAKS AV. THIS PROJECT IS LOCATED IN SOUTH PASADENA ON FAIR OAKS AV BETWEEN COLUMBIA ST AND HUNTINGTON DR. IT WILL ESTABLISH A FIBER-OPTIC BACKBONE COMMUNICATION SYSTEM CONNECTION BETWEEN 12 SIGNALS ON FAIR OAKS AV AND CITY HALL AND INSTALL THE ATMS/CENTRAL MANAGEMENT/CONTROL SYSTEM AT ITS CITY HALL BUILDING. FUNDS ARE FOR DESIGN AND CONSTRUCTION COSTS.*

4

## Concerns

The City of San Marino has been established as a residential community for over 100 years. It is entirely built, with no room for growth and is located in the San Gabriel valley such that an abundance of cut-through traffic utilizes the residential streets. We are being overwhelmed by ever increasing traffic. There is little in the EIR that addresses this issue. The planned projects for the surrounding areas risk negating the stated Plan goals with regard to the City of San Marino.

The increasing traffic is a public nuisance, exacerbates environmental conditions and diminishes public safety. Of particular concern to us are the following:

- Increasing northbound-southbound traffic utilizing residential streets as cut-through routes.
- Increasing eastbound-westbound traffic utilizing residential streets as cut-through routes.
- Increasing eastbound-westbound traffic utilizing Huntington Drive with significant safety risk to students and residents. Residences and six schools are located on the segment of Huntington Drive in San Marino.
- The implementation of Adaptive Traffic Control Systems.

5

The environmental impacts defer to local jurisdiction and cannot *conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities*. The SCAG Regional Transportation Plan, is just that: **regional**, and proposes many projects for increasing mobility and traffic flow, that do not originate in the city of San Marino, but will adversely affect it by increasing its ongoing operating costs, decreasing property values and diminishing the quality of life of the residents. It appears that the city of San Marino, with local jurisdiction, is left to fend for itself.

Sincerely,



Stephanie Johnson and Ghassan Roumani

cc: Marcella Marlowe, Ph.D, City Manager, City of San Marino  
 Michael Throne, PE, Parks & Public Works Director/City Engineer, City of San Marino  
 Gretchen Shepherd Romey, Mayor, City of San Marino  
 Ken Ude, Vice Mayor, City of San Marino  
 Dr. Steven W. Huang, Council Member, City of San Marino  
 Susan Jakubowski, Council Member, City of San Marino  
 Steve Talt, Council Member, City of San Marino