

# Connect SoCal

The Southern California Association  
of Governments' 2024–2050  
Regional Transportation Plan/  
Sustainable Communities Strategy



## EXHIBIT C STATEMENT OF OVERRIDING CONSIDERATIONS

### Final Program Environmental Impact Report

Certified April 4, 2024 | State Clearinghouse #2022100337



## EXHIBIT C

# Statement of Overriding Considerations Regarding the Final PEIR for Connect SoCal 2024

---

- C.1 Introduction
- C.2 Plan Impacts and Associated Mitigation Measures
- C.3 Plan Benefits
- C.4 Conclusion

## C.1 INTRODUCTION

### C.1.1 CEQA REQUIREMENTS

CEQA requires that a lead agency balance the benefits provided by a project against its unavoidable environmental risks in determining whether to approve the project and authorizes a public agency to approve a project with significant and unavoidable environmental impacts if it finds that such impacts are acceptable because they are outweighed by the benefits of the project. In making this determination, Southern California Association of Governments (SCAG), as the Lead Agency, is guided by CEQA Guidelines Section 15093, which provides as follows:

- a) *CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."*
- b) *When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.*
- c) *If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.*

Consistent with these guidelines and the California Public Resources Code Section 21081(b), the Final Program Environmental Impact Report (2024 Final PEIR) for SCAG's 2024 -2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), referred to herein as Connect SoCal 2024 ("Plan" or "Project") has identified and discussed potentially significant adverse environmental impacts that may occur as a result of implementation of the Plan and has made a good-faith effort to eliminate and/or minimize all potentially significant adverse impacts that may result from implementation of the Plan through the adoption of feasible mitigation measures. SCAG made specific Findings pursuant to CEQA Guidelines Section 15091, on each of the significant environmental impacts of the Plan and on mitigation measures and alternatives (see Exhibit B, Findings of Fact). Nevertheless, even with implementation of feasible mitigation measures, impacts remain significant and unavoidable. However, after considering the Plan and the entire administrative record and weighing the Plan's economic, legal, social, technological, environmental, and other benefits, including regionwide or statewide environmental benefits, against its unavoidable adverse environmental impacts, SCAG Regional Council finds that each of the benefits of the Plan described below is an overriding consideration that outweighs the Plan's potentially significant and unavoidable adverse environmental impacts.

## C.2 PLAN IMPACTS AND ASSOCIATED MITIGATION MEASURES

### C.2.1 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

The 2024 PEIR identifies the following significant and unavoidable environmental impacts associated with the Plan (including associated cumulative effects):

- 3.1 Aesthetics (AES-1 [scenic vistas], AES-2 [scenic resources], AES-3 [views and visual character], and AES-4 [light and glare])
- 3.2 Agricultural and Forestry Resources (AG-1 [farmland conversion], AG-2 [agricultural zoning conflicts], AG-3 [forest land zoning conflicts except for impact to timberland production zones], AG-4 [loss or conversion of forest land], and AG-5 [other changes resulting in conversion of agricultural or forest land])
- 3.3 Air Quality (AQ-1 [conflicts with air quality management plans except for consistency with federal transportation conformity requirements], AQ-2 [cumulative criteria pollutant increases], AQ-3 [substantial pollutant concentrations], and AQ-4 [odors])
- 3.4 Biological Resources (BIO-1 [sensitive species], BIO-2 [sensitive natural communities], BIO-3 [wetlands], BIO-4 [wildlife movement], BIO-5 [local policies or ordinances], and BIO-6 [habitat conservation plan conflicts])
- 3.5 Cultural Resources (CUL-1 [historic resources], CUL-2 [archaeological resources], and CUL-3 [human remains])
- 3.6 Energy (EN-1 [wasteful, inefficient, or unnecessary consumption of energy] and EN-2 [renewable energy and energy efficiency plan conflicts])
- 3.7 Geology and Soils (GEO-1 [fault rupture and seismic hazards], GEO-2 [soil erosion/loss of topsoil], GEO-3 [unstable geologic units], GEO-4 [expansive soils], GEO-5 [septic systems], and GEO-6 [paleontological resources])
- 3.8 Greenhouse Gas Emissions (GHG-1 [greenhouse gas emissions] and GHG-2 [greenhouse gas reduction plan conflicts except for consistency with SB 375])
- 3.9 Hazards and Hazardous Materials (HAZ-1 [hazardous materials transport, use, and disposal], HAZ-2 [hazardous materials releases], HAZ-3 [hazardous emissions near schools], HAZ-4 [listed hazardous materials sites], HAZ-5 [airport hazards], HAZ-6 [emergency response and evacuation plan conflicts], and HAZ-7 [wildland fires])
- 3.10 Hydrology and Water Quality (HYD-1 [violation of water quality standards], HYD-2 [groundwater supplies and recharge], HYD-3A [erosion and siltation], HYD-3B [on- or off-site flooding], HYD-3C [exceed storm drain capacity], HYD-3D [impede or redirect flood flows], HYD-4 [flood hazard, tsunami, and seiche zones], and HYD-5 [water quality control plan and groundwater management plan conflicts])
- 3.11 Land Use and Planning (LU-1 [physical division of communities] and LU-2 [conflicts with land use plans, policies, and ordinances])
- 3.12 Mineral Resources (MIN-1 [loss of availability of mineral resources] and MIN-2 [loss of availability of resource recovery sites])
- 3.13 Noise (NOISE-1 [temporary or permanent ambient noise increases], NOISE-2 [groundborne noise and vibration], and NOISE-3 [aircraft noise])

- 3.14 Population and Housing (POP-1 [induce substantial population growth], and POP-2 [displace of people and housing])
- 3.15 Public Services (PS-1 [new or altered fire protection facilities], PS-2 [new or altered police protection facilities], PS-3 [new or altered educational facilities], PS-4 [new or altered library facilities], and PS-5 [new or altered parks and recreational facilities])
- 3.16 Recreation (REC-1 [physical deterioration of existing facilities] and REC-2 [construction or expansion of parks and recreational facilities])
- 3.17 Transportation, Traffic, and Safety (TRA-1 [conflicts with alternative transportation plan, policies, or ordinances], TRA-2 [vehicle miles traveled], TRA-3 [hazardous design features], and TRA-4 [emergency access])
- 3.18 Tribal Cultural Resources (TCR-1 [substantial adverse effects on tribal cultural resources])
- 3.19 Utilities and Service Systems (UTIL-1 [new or expanded water wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities], UTIL-2 [wastewater treatment capacity], UTIL-3 [water supply sufficiency], UTIL-4 [solid waste disposal capacity], and UTIL-5 [solid waste management regulation compliance])
- 3.20 Wildfire (WF-1 [impairment of emergency response and evacuation plans], WF-2 [exacerbation of wildfire risks], WF-3 [increase wildfire risk from infrastructure], and WF-4 [exposure to secondary hazards])

As noted in the various sections in Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*, of the 2024 PEIR, because the Plan, in and of itself, would result in significant adverse environmental impacts with respect to the impacts enumerated above, these impacts would add to the environmental impacts of other cumulative or related projects.

## C.2.2 PLAN FEATURES

Connect SoCal 2024 represents SCAG's vision for the region and reflects the planned transportation investments, policies and strategies that will integrate with the Forecasted Regional Development Pattern to achieve the Plan's goals.<sup>1</sup> The vision and goals for Connect SoCal 2024 are rooted in the direction set forth by Connect SoCal 2020 and the preceding plans, reflecting both SCAG's statutory requirements and the emerging trends and persistent challenges facing the region.

SCAG's vision for Southern California in the year 2050 is:

*"A healthy, prosperous, accessible and connected region for a more resilient and equitable future."*

The following are the goals and subgoals of Connect SoCal 2024 designed to help SCAG achieve this vision:

**Mobility: Build and maintain an integrated multimodal transportation network.**

- Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.

---

<sup>1</sup> As noted in the Plan's "Supplementals" section, the Plan's Forecasted Regional Development Pattern does not reflect the only set of growth assumptions that will meet the statutory requirements.

- Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.
- Support planning for people of all ages, abilities and backgrounds.

**Communities: *Develop, connect and sustain communities that are livable and thriving.***

- Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances.
- Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.

**Environment: *Create a healthy region for the people of today and tomorrow.***

- Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change.
- Integrate the region’s development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.
- Conserve the region’s resources.

**Economy: *Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents.***

- Improve access to jobs and educational resources.
- Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.

The Plan recognizes the continuous growth in the region and balances region-wide policy goals established by SCAG, as well as legal and statutory requirements, for a long-range regional transportation plan and sustainable communities strategy that achieves these goals better than the alternatives (see Section B.7, *Findings Regarding Alternatives*). The goals, objectives, policies, strategies, and investments in the Plan were derived from an extensive collaborative process with public participation and consultation efforts led by SCAG and reflect broad agency and public support. As indicated in Connect SoCal 2024, the Plan will provide a return of \$2.00 for every dollar invested. The Plan provides over \$750 billion of investment in our regional transportation system. Greater commitments in infrastructure preservation spending will ensure maintaining and even improving the productivity of our transportation system, thereby accruing greater benefits associated with mobility, congestion relief, economic activity, safety, and accessibility.

The regional development pattern promoted by the Plan accommodates forecasted population, housing, and employment growth while improving access to employment and services throughout the region. In 2050 as compared to trend or No Plan Alternative, Connect SoCal 2024 would result in a greater share of new housing and new jobs in Priority Development Areas (PDAs) – i.e., areas with access to multiple modes of transportation or trip origins and destinations are closer together, thereby allowing for shorter trips. The Plan would also result in substantially fewer single-family homes in the region and many more multi-family units. The focus on development in proximity to transit and other opportunity areas, as well as a focus on multi-family development will help the region accommodate housing demand in a sustainable manner. The compact land use patterns described in the Plan, combined with the transportation network improvements and strategies identified in the Plan, would result

in improved transit, pedestrian and bicycle access to community amenities, shorter average trip length, and reduced vehicle miles traveled per person.

To achieve these goals, the Plan implements the following Regional Planning Policies and Implementation policies.

## **REGIONAL PLANNING POLICIES AND IMPLEMENTATION STRATEGIES**

SCAG developed a set of Regional Planning Policies to guide decision-making in the region that aligns with the Plan's vision and achievement of the goals. The Regional Planning Policies establish broad regional policies for integrated land use and transportation planning and identify the path towards realizing the vision of Connect SoCal 2024. The policies carry forward priorities that have been refined over several planning cycles to promote a multimodal transportation system and sustainable land use and development. Implementation of the policies at the regional and local level will address emerging issues facing the region and achieve the vision represented by Connect SoCal 2024.

The policies are meant to guide decision making for both SCAG and partner agencies to achieve a sustainable, equitable, and resilient future for the region. The policies are also intended to be used as a resource by CTCs or local jurisdictions to demonstrate alignment with the RTP/SCS in seeking resources from state or federal programs.

The Implementation Strategies articulate priorities for SCAG to implement Connect SoCal 2024 by fulfilling or going beyond the related Regional Planning Policies. The SCAG related strategies represent near term efforts for the successful implementation of the Plan. These implementation strategies rely on partnership and support with agencies and decisions makers in the region. Refer to Chapter 3 of the Final Plan for the complete list of Regional Planning Policies and Implementation Strategies.

Per Government Code Section 65080(b)(2)(K), SCAG's SCS does not regulate the use of land, nor shall it be interpreted as superseding the exercise of the land use authority of cities and counties in the region. The guidance provided in the Plan's Regional Planning Policies is meant to support local jurisdictions in future General Plan updates to help in implementing the regional vision of Connect SoCal 2024.

### **C.2.3 MITIGATION MEASURES**

For each of the impacts noted above (with the exceptions of specific impacts under Thresholds AG-3 [related to timberland production zones impacts], AQ-1 [federal transportation conformity requirements], and GHG-2 [consistency with SB 375]), SCAG has identified program-level mitigation measures, which are the responsibility of SCAG, as well as project-level mitigation measures, which lead agencies can and should consider during subsequent review of transportation and land use projects, as appropriate and feasible. SCAG does not implement transportation projects or land use developments in the Plan, nor does it have authority to require lead agencies to implement project-specific mitigation measures. However, SCAG anticipates that lead agencies will require mitigation measures as appropriate and feasible at the project level if they identify potential impacts in any issue/resource areas addressed in this 2024 PEIR. While these mitigation measures will reduce impacts of individual projects (including to a less than significant level for some projects), they will not reduce any significant adverse environmental impacts of the Plan to less than significant at the regional level.

## C.3 PLAN BENEFITS

The Plan would provide several benefits through its four goal areas:

### **Mobility**

Connect SoCal 2024 works to address regional mobility and accessibility challenges by promoting job accessibility, enabling shorter commutes, making communities safer and encouraging lower-cost housing developments. Implementation of the Plan would increase transit services and ridership which serves as a key component of local, regional, and state efforts to combat climate change, reduce congestion, and improve accessibility to jobs and retail. Mobility and accessibility enhancements would improve the quality of life for the poor, recent immigrants, and the elderly by providing easier access to critical services.

The Plan provides safety initiatives such as active transportation strategies (i.e., bicycling and walking) by providing \$38 billion in capital funding for expanded active transportation networks and \$8.8 billion for active transportation operations and maintenance throughout the region. The Plan advocates for complete streets policies, promotes transit, active transportation, pedestrian infrastructure and supports implementation on all non-limited access streets throughout the region and a range of planning resources. By expanding complete streets concepts to accommodate and optimize new technologies and micro-mobility options (e-scooters and e-bikes), first-last mile connections to transit and curbside management strategies, the region will achieve greater mode shift and reductions to VMT.

Maintaining the operational efficiency of the region's transportation system is crucial. Demand on the system has increased over the decades without sufficient maintenance reinvestment. This has greatly influenced the number of roadways and bridges that have fallen into an unacceptable state of disrepair. Part of the challenge is to ensure that projects in the Plan follow a "fix-it-first" principle and that life-cycle costs, such as maintenance and preservation expenses, are considered and planned for during the development of infrastructure projects.

Compared to the trend or No Plan scenario, benefits include:

- The Plan would result in a decrease in delay metrics across the board, including minutes of delay per capita; person hours of delay on highways, HOV lanes, and arterials; hours of delay for heavy duty trucks on highways and arterials; and mean commute time for all modes.
- The mode share for walking and biking would increase for all trip types.
- Strategies such as complete streets, protected bikeways and safe routes to school infrastructure would improve safety for vulnerable road users as well as drivers.
- The Plan allocates \$384 billion toward maintaining and operating the transportation system in a state of good repair. This amounts to an average annual per capita investment of about \$780 for each year of the Plan.

### **Communities**

The development pattern of the Plan would accommodate the forecasted population, housing and employment growth while improving access to employment and services throughout the region. Additionally, land use patterns and strategies described in the Plan, combined with transportation network improvements and strategies of the Plan would result in improved access to community amenities, shorter average trip lengths, and reduced vehicle miles traveled per person. Furthermore, conservation planning policies and strategies referenced in the Plan would

support natural land restoration, conservation, and protection. The Plan includes implementation of strategies that provide recommended practices and approaches to address disproportionate adverse impacts on Equity Priority Communities. Compared to the trend or No Plan Alternative, benefits include but are not limited to:

- The Plan would result in an increase in the percentage of the region's total household and employment growth occurring within Priority Development Areas.
- The Plan would decrease regional VMT per capita and person hours of delay per capita.
- Improved housing supply and affordability with associated reductions in overcrowding including in Equity Priority Communities.
- Reduction in jobs-housing imbalance, neighborhood change and displacement.
- Improved regional conditions for Equity Priority Communities in accessibility to employment, services, parks, and education facilities, and impacts along freeways (travel time and travel distance savings).

### **Environment**

The Plan would encourage transportation investments that will result in improved air quality, reduced greenhouse gas emissions and protect natural lands and biological resources. Transportation interventions such as Transportation System Management strategies aim towards reducing traffic congestion, improve air quality and reduce greenhouse gas emissions. Additionally, land use strategies such as the Priority Development Areas and 15-Minute Communities aim to expand air quality, congestion and VMT reduction benefits in the region. Natural and Agricultural Land Preservation strategies aim to restore habitats degraded by pollution, invasive species, and protect wildlife corridors. Compared to the trend or No Plan scenario, benefits include:

The Plan would provide air quality and regional public health benefits by reducing criteria air pollutant emissions including ROG, CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions and supporting the attainment of federal public health-based air quality standards throughout the SCAG region.<sup>2</sup>

The Plan would achieve greenhouse gas (GHG) emissions reduction targets required under SB 375 for 2035. While recognizing that the region will continue to grow, by meeting the SB 375 targets, the Plan has contributed its regional share of GHG emissions reduction to be in alignment with the state's near- and long-term GHG emissions reduction goals and requirements as set forth in California Global Warming Solutions Act of 2026 (AB 32) and Senate Bill 32 (SB 32).

- The Plan would result in a decrease in the total amount of greenfield consumed.
- The share of all trips using a travel mode other than single-occupancy vehicle (SOV) would increase from. A greater mode share for non-SOV will improve regional performance in regard to GHG emissions, per capita VMT, and air quality. It would also improve public health and traffic congestion outcomes.
- The Plan would result in 5.9 percent less total regional VMT when compared to the No Project Alternative. The Plan would decrease total regional VMT from approximately 479 million to 450 million when compared to the No Project Alternative.

---

<sup>2</sup> The Plan results in lower health risks related to transportation-generated toxic air contaminants near freeways and high-volume roadways. The total health risk summed across the analyzed representative segments under the Plan (1,553 in 1 million) would be less than the No Project (1,575 in 1 million) and less than under existing conditions (4,532 in 1 million).

- The Plan would result in less energy and water used by residential and commercial buildings.
- Reduction of regional and local emissions impacts, roadway noise impacts and rail-related impacts.

## Economy

The Plan will employ people to build, operate and maintain transportation projects as a result of the regional infrastructure investments outlined in the Plan (see Chapter 2, *Project Description*). The Plan would also increase accessibility to jobs. The Plan would encourage regional growth and employing transportation strategies in Priority Development Areas with employment densities substantially higher than neighboring areas. When growth is concentrated in these areas, the length of vehicle trips can be reduced. Compared to the trend or No Plan scenario, benefits include but are not limited to:

- The Plan would generate more new jobs annually due to improved regional economic competitiveness and investments in the regional transportation system.
- Reduction of traffic congestion would increase employment growth as drivers would require less travel time from place to place.
- Reduction of local traffic congestion would also increase employment growth as downtowns and pedestrian-oriented neighborhoods would increase walkability, thereby providing high amenity locations that are attractive to businesses.
- The Plan would bolster the regional goods movement system by improving accessibility to goods from ports to local businesses.

The Plan would result in a reduction of total energy use and therefore total energy cost savings.<sup>3</sup>

The Plan would result in a reduction of total water use and therefore total water cost savings.

Considering the effectiveness of investments beyond the goal areas, Plan is expected to result in substantial cost-effective benefits for the region. More specifically:

- The Plan will provide a return of \$2.00 of benefit for every dollar invested.

## C.4 CONCLUSION

Despite implementation of the Regional Planning Policies and Implementation Strategies in the Plan and all feasible mitigation measures, and assuming compliance with all applicable laws and regulations, due to the regional nature of the analysis, unknown site conditions and project specific-details, and SCAG's lack of land use authority over individual projects, approval of the Plan may result in significant and unavoidable adverse environmental impacts in all of the identified issue areas. However, for the foregoing reasons and based on the 2024 Final PEIR and the entire administrative record, SCAG Regional Council hereby determines that when the potential significant and unavoidable adverse environmental impacts are balanced against the Plan's specific benefits, the benefits of the Plan outweigh the impacts and warrant approval of the Plan. While the Plan's impacts cannot be reduced to a level of less than significant, the Plan balances the need for SCAG to meet its legal

---

<sup>3</sup> The overall energy savings resulting from developing more compactly translates to meaningful savings in transportation (fuel and automobile) costs (-6.2 percent) and reduces annual household total costs (residential utilities and driving) from \$12,891 without the Plan to \$12,165 with the Plan in 2050, thus providing a total saving of \$726 per household (-5.6 percent).

requirements to adopt a long-range regional transportation plan and sustainable communities strategy which will maintain and improve the productivity of our transportation system and accrue benefits associated with improved regional mobility, congestion relief, economic activity, safety, and accessibility, and the need to protect the environment of Southern California to the greatest extent feasible.

For the above-mentioned reasons, the SCAG Regional Council hereby finds that each of the benefits of the Plan is a consideration that outweighs and overrides any significant and unavoidable adverse environmental impacts associated with the Plan and warrants approval of the Plan.



## Main Office

900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017  
Tel: (213) 236-1800  
[www.scag.ca.gov](http://www.scag.ca.gov)

## Regional Offices

### Imperial County

1503 N. Imperial Ave., Ste.104  
El Centro, CA 92243  
Tel: (213) 236-1967

### Orange County

OCTA Building  
600 S. Main St., Ste. 1143  
Orange, CA 92868  
Tel: (213) 236-1904

### Riverside County

3403 10th St., Ste. 805  
Riverside, CA 92501  
Tel: (951) 784-1513

### San Bernardino County

1170 W. Third St., Ste. 140  
San Bernardino, CA 92410  
Tel: (213) 630-1499

### Ventura County

4001 Mission Oaks Blvd., Ste. L  
Camarillo, CA 93012  
Tel: (213) 236-1960