

**Regional Council  
List of Public Comments**

Received before 5pm on Wednesday, April 3, 2024

	<b>Date</b>	<b>Sender Name</b>	<b>Organization</b>	<b>Agenda Item (AI #)</b>	<b>Subject Matter</b>
1.	04/02/2024	Lucy Dunn	SCAG Business Representative/GLUE Council Chair	RC AI #2 – Proposed Final Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy)	Letter of support for the adoption of SCAG’s Regional Transportation Plan/Sustainable Communities Strategy Connect SoCal 2024
2.	04/03/2024	Claire Schlotterbeck, Executive Director	Hills for Everyone	RC AI #2 – Proposed Final Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy)	Comments on the Proposed Final 2024 Connect SoCal, the Land Use and Communities Technical Report, the Project List, and the Program Environmental Impact Report and Statement. They support the Plan, but hope that over the next four years before the 2028 Plan is developed that SCAG reduces the significant and unavoidable agricultural and biological resources impacts with more meaningful and substantive mitigation measures.
3.	04/03/2024	Melanie Schlotterbeck, Green Vision Project Coordinator	Friends of Harbors, Beaches and Parks (FHBP)	RC AI #2 – Proposed Final Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy)	Comments on the Proposed Final 2024 Connect SoCal and the Program Environmental Impact Report and Statement. FHBP provides these comments on the final plan and supports the inclusion of more robust natural and farmland policies, programs, and mitigation measures. Aside from our

					comments, we wish to relay our dismay that the public is expected to review thousands of pages of highly technical information in one week prior to a decision that also coincides with a major holiday weekend.
4.	04/03/2024	Dr. Mike McCarthy	Riverside Neighbors Opposing Warehouses	RC AI #2 – Proposed Final Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy)	Dr. McCarthy urges this council to reconsider its inequitable and environmentally damaging Connect SoCal 2024 PEIR. This programmatic EIR fails to take any action to reduce the growth rate of the Goods Movement industry and, in fact, renders it exempt from any mitigation measures to reduce Truck VMT.
5.	04/03/2024	Melanie Schlotterbeck, Green Vision Project Coordinator	Ms. Schlotterbeck submitting letter on behalf of the Natural and Farmlands Coalition	RC AI #2 – Proposed Final Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy)	The Natural and Farmlands Coalition write with additional comments on the proposed final plan and support the inclusion of more robust natural and farmland policies to reduce, minimize, or mitigate the Plan’s impacts considerably.

# MEMO

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**To:** Regional Council (RC)  
**From:** Lucy Dunn, GLUE Chairperson  
**CC:** Sarah Jepson, Chief Planning Officer, SCAG  
**Date:** April 4, 2024  
**Re:** Connect SoCal 2024 Support Letter from GLUE Council

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On behalf of the Global Land Use and Economics (GLUE) Council, I am happy to provide this letter of support for the adoption of SCAG's Regional Transportation Plan/Sustainable Communities Strategy ("Connect SoCal 2024"). Members of SCAG's GLUE Council, which is made up of multi-sector leaders representing the region's diverse economic and business interests, discussed the proposed Connect SoCal 2024 at its meeting on April 1, 2024.

GLUE Council members expressed overall satisfaction with the Plan's inclusion of and attention to key business community priorities. Specifically, in a letter dated July 18, 2023, a coalition of business community entities shared the following policy principles for consideration in the development of Connect SoCal 2024:

1. Accounts for and Includes the Benefits of All Recent Technological and Societal Changes in Calculating its GHG/VMT Reductions.
2. Properly Models Transportation Demand Reflecting Updated Housing Elements and the Affordability Considerations that Underpin Them.
3. Supports the Accelerated Production of New Housing in Compliance with the Housing Crisis Act and other State Housing Law Reforms.
4. Provides Positive Economic Impacts ... A Plan that is Pro Economic Growth and Job Creation.
5. Commitment to Transparency and Disclosure.
6. Assures New Revenue Sources are Fair, Equitable and Economically Sound.

The consensus of GLUE Council members is that these policy principles are represented in the final proposed Connect SoCal 2024. For instance,

**Goods movement:** (in reference to principle #4 above)

Continuing to invest in Southern California's goods movement infrastructure is necessary to maintaining the region's economic vitality. We applaud SCAG for recognizing the importance of investment in transportation infrastructure to support the safe and efficient movement of goods by including \$63 billion in capital expenditures for goods movement projects in Connect SoCal 2024. Moving forward, we need pragmatic pathways to stay competitive and still meet infrastructure and energy needs in light of the State's commitment to protecting the environment, becoming more climate resilient, and addressing environmental justice concerns. We support SCAG's proposed Comprehensive Sustainable Freight Plan to produce critically needed analysis, policies, and strategies, and to explore new and evolving paradigms to address complex challenges and ensure the region can continue to play a critical role in the global supply chain while meeting economic, mobility, environment, and community goals. We support this regional leadership effort which will produce the research, communications, and actions that will increase the

knowledge and appreciation for the ports and the goods movement sector to our region, state, and nation. We want to work with SCAG in this effort to create opportunities for regionwide communication, coordination, and understanding between businesses, utilities, regulatory agencies and regional planning agencies to better prioritize projects, secure sufficient funding, and increase system-wide integration and efficiencies.

**Clean energy transition:** (in reference to principle #1 above)

We support the commitment to advance the transition to clean transportation technologies identified in Connect SoCal 2024, including the development of a roadmap for supporting infrastructure for zero-emission medium- and heavy-duty trucks, and supporting local jurisdictions in the planning and development of infrastructure and incentives for zero-emission passenger vehicles. These efforts are critical to ensure that the multitude of state regulations (Advanced Clean Cars II, Advanced Clean Fleets, Innovative Clean Transit) can be met. We also appreciate that the plan recognizes the need to continue to support near-zero emission technologies to offer short-term benefits where zero-emissions solutions are not yet feasible or commercially viable.

We appreciate that SCAG's implementation strategies include the continued research and investigation into public-private partnerships for technology deployment and opportunities to enhance the capacity and sustainability of the state's energy supply to support this transition. We also appreciate SCAG's commitment to technology neutrality – the advancement of, and investment in, any technology should be based on what is most appropriate for the given context and need.

**Housing:** (in reference to principle #3 above)

We appreciate that Connect SoCal 2024 reflects the growth of 1.6 million household units over the horizon of the plan, accommodating the 1,341,827 housing units required by the 6th Cycle RHNA. The inclusion of the Regional Planning Policies are a helpful step in providing jurisdictions more tools to demonstrate alignment with a Sustainable Communities Strategy for the purposes of seeking funds like through the state's Affordable Housing Sustainable Communities program or in seeking CEQA streamlining. We appreciate the various policies and strategies that are centered on supporting our region to achieve housing production from supporting local jurisdictions on their housing elements and exploring strategies to increase housing production in the region.

Thank you for the inclusion of a standalone Housing Technical Report that provides a comprehensive summary of the region's housing challenges and highlights the importance of this issue in regional transportation planning. Further, the analysis in section 6 of the Economic Impact Analysis technical report underscores the harm to the economy if we are unable to increase housing production.

Ultimately, the Plan's vision to increase housing production throughout the region can only be achieved through stronger partnerships with the private sector and greater investment of public funds. While Connect SoCal 2024 anticipates nearly \$3 billion for housing supportive infrastructure through value capture strategies, like EIFDs and TIF, the cost of achieving regional housing goals is far greater. Increased funding will offer more opportunities to implement the Plan's goals, policies, and strategies toward meeting housing need. In addition, forming partnerships between SCAG and the private sector can help ensure that the collective housing challenges our region faces will be addressed as a stronger multi-faceted approach.

**Workforce Development, Economy and Technology:** (in reference to principles #1 and 4 above)

We appreciate the discussion in Chapter Two regarding changes to the future of the workplace and SCAG's increased assumptions regarding continued telework rates. SCAG must continue to track these trends and incorporate them into their modeling and analysis. We appreciate the inclusion of Regional Planning Policy language that speaks to the importance of "fostering a positive business climate by promoting regional collaboration in workforce development and economic development" (#82) and the need to "foster a resilient workforce" (#85). Additionally, it's important that Connect SoCal is pro economic growth and jobs creation. We see this in the cost-benefit analysis providing \$2.00 in benefits for every dollar spent and in the creation of over 450,000 jobs annually.

**Road charge /Fair Revenue sources:** (in reference to principle #6 above):

With the passage of Advanced Clean Cars II and increasing fuel efficiency it is necessary to find a replacement for fuel tax revenue. However, any new user fee systems need to be developed in a way that is fair and equitable and in a way that does not disproportionately disadvantage low-income workers. We appreciate that in SCAG's Implementation Strategies, SCAG intends to lead the study and piloting of user fee programs.

Addressing VMT Increases from Roadway Capacity-Increasing Projects: As Senate Bill 743 implementation is still evolving, one of the most essential roles of SCAG and the region will be to develop a coordinated approach for strategic improvements to the roadway network where necessary to ensure greater safety and reliability and to support the development of local and regional VMT mitigation programs, as may be appropriate. This is particularly important for the continuing build out of the SCAG region's express lanes network, providing more reliable travel times for commuters to employment centers (by auto or bus) and for addressing critical freight bottlenecks that often impede safety and access to some communities in the region.


In light of the above-mentioned inclusions in response to business community policy priorities in Connect SoCal 2024, the GLUE Council voted by consensus on April 1, 2024 to support adoption of the Final Connect SoCal 2024, and we encourage the Regional Council to adopt this Plan.

## HFE Comment Letter

Claire Schlotterbeck <claire@schlotterbeck.net>

Wed 2024-04-03 9:27 AM

To:ConnectSocial <ConnectSoCal@scag.ca.gov>;2024 PEIR <ConnectSoCalPEIR@scag.ca.gov>;ePublic Comment Group  
<ePublicComment@scag.ca.gov>

 1 attachments (2 MB)

HFE Comments on SCAG Proposed Final Connect SoCal 040324 FINAL.pdf;

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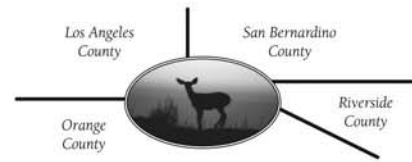
Attached please find our comments on SCAG's Connect SoCal and PEIR. Please confirm receipt of this email.

Claire Schlotterbeck  
Executive Director  
Hills For Everyone

# H i l l s F o r E v e r y o n e

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*Southern California comes  
together at the Puente-Chino Hills*



April 3, 2024

Submitted via email to: [ConnectSoCal@scag.ca.gov](mailto:ConnectSoCal@scag.ca.gov),  
[ConnectSoCalPEIR@scag.ca.gov](mailto:ConnectSoCalPEIR@scag.ca.gov), and [ePublicComment@scag.ca.gov](mailto:ePublicComment@scag.ca.gov)

Attn: Connect SoCal Team and Regional Council  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017

RE: Comments on the Proposed Final 2024 Connect SoCal, the Land Use and Communities Technical Report, the Project List, and the Program Environmental Impact Report and Statement

Dear Connect SoCal Team, Chair Art Brown, and Regional Council members:

Hills For Everyone (HFE) submits these comments on the Proposed Final 2024 Regional Transportation Plan and Sustainable Communities Strategy (collectively Connect SoCal) and its environmental document, the Program Environmental Impact Report/Statement.

By way of background, HFE is a 47-year-old non-profit organization that established Chino Hills State Park (CHSP) and is still working to conserve the remaining natural lands in the Puente-Chino Hills Wildlife Corridor at the juncture of Los Angeles, Orange, San Bernardino, and Riverside Counties.

Our comments on the Proposed Final 2024 Connect SoCal (the Plan), the Land Use and Communities Technical Report, the Project List, and the Program Environmental Impact Report and Statement (PEIR) are sectioned below by document, then chapter, page, and the referenced material (often with a quote), followed by our comments, concerns or support.

While we recognize the considerable impact the Plan has on agricultural and natural lands with the loss of 26,880 acres (per the Land Use and Communities Technical Report, pg. 60), we also note that business as usual will result in an increase in these impacts (50,560 acres, *ibid.*). Consequently, we support the Plan, but hope that over the next four years before the 2028 Plan is developed that SCAG actually reduces the significant and unavoidable agricultural and biological resources impacts with more meaningful and substantive mitigation measures.

## CONNECT SOCIAL

**Page:** 13

**Reference:** "SCAG's work helps facilitate implementation, but the agency does not directly implement or construct projects or have land use authority."

**Remaining Concern:** Again, we agree, but SCAG is best suited to lead regional projects like Regional Advance Mitigation Program (RAMP) and SoCal Greenprint. Let's prioritize implementing RAMP and mitigation measures to reduce agricultural and biological resource impacts identified in the PEIR.

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**Chapter:** 2 – Our Region Today

**Page:** 35

**Reference:** "By the year 2050, the region is projected to face numerous challenges and pressures due to climate change, including heightened risks of intense wildfires, droughts, extreme heat, extreme rain, rising sea levels and seismic events. The region is already experiencing extreme climate-related events more frequently, such as air-quality degradation, inland flooding, the destruction of homes and infrastructure from wildfires, landslides from torrential rainstorms, coastal flooding from sea level rise, and urban heat island effects from unusually high temperatures."

**Remaining Concern:** The document overlooks the direct impact of climate change on Southland residents, focusing instead solely on infrastructure. Residents face significant challenges, including evacuation, work disruption, housing insecurity, and lack of basic necessities during wildfires. Additionally, inadequate evacuation routes and power outages heighten stress and trauma. We urge a shift in focus from neighborhood safety to prioritizing the safety and well-being of individuals, emphasizing the tangible connection between climate impacts and people.

**Page:** 36

**Reference:** "Resilience is defined as the capacity of the SCAG region's built, social, economic, and natural systems to anticipate and effectively respond to changing conditions, acute shocks and chronic stressors by creating multiple opportunities for a sustainable, thriving and equitable future."



**Remaining Concern:** As we pointed out in our original comment letter, the cause-and-effect relationship is unclear. For instance, wildfires can lead to mudslides in affected areas. Moreover, shocks can transition into chronic stressors. To enhance resilience, SCAG should update planning strategies and utilize advanced tools like Wildfire Modeling while drawing the connection between the cause-and-effect.

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**Chapter:** 3 - The Plan

**Page:** 36

**Reference:** "Shocks are sudden and acute events that threaten immediate safety and well-being, such as earthquakes and wildfires. Stressors are chronic challenges that weaken built, social, economic and natural systems, including persistent air-quality issues or transportation system disrepair."

**Remaining Concern:** SCAG lists multiple other Implementation Strategies within the Plan that feature pilot programs, but fails to improve public safety by addressing shocks and stressors through local partnerships and pilot programs like those mentioned in our January 2024 letter.

**Page:** 103-104

**Reference:** GRRRA categories: Flood Areas, Coastal Inundation (Sea Level Rise), Wildfire Risk, Open Space and Parks, Endangered Species and Plants, Sensitive Habitats, Sensitive Habitat Areas, Natural Community and Habitat Conservation Plans, Tribal Lands, Military Installations, and Farmlands.

**Remaining Concern:** We urge inclusion of "Unstable Landforms" in the topic areas due to topographic, tectonic, and liquefaction history in Southern California. Landslides, particularly along the coast, affect transportation infrastructure and housing, exacerbated by climate change. For instance, OCTA has faced rail service disruptions due to slope failures. Inland areas also experience landslide issues, sometimes aggravated by rainfall and wildfires. SCAG should incorporate this topic, highlighting the impact on life, property, and infrastructure.

**Page:** 107

**Reference:** "Natural and Agricultural Land Preservation: Preserving natural and agricultural lands can strengthen our communities, improve essential resources like our air, water and food, protect and enhance biodiversity, and capture greenhouse gases instead of allowing them to concentrate in the atmosphere."

**Remaining Concern:** None of the strategies or implementation measures in Connect SoCal or mitigation measures of PEIR actually achieve this stated goal of natural and agricultural land preservation—especially considering the PEIR notes the loss of these lands is "significant and unavoidable." SCAG should

incorporate improved policies or better mitigation measures in the PEIR that actually increase natural and agricultural land preservation.

**Page:** 119

**Reference:** The document states “encourage the protection and restoration of wildlife corridors.”

**Remaining Concern:** Same comment as above. None of the policies, strategies, implementation measures, or PEIR mitigation measures achieve the stated goal of protecting or restoring wildlife corridors.

## LAND USE AND COMMUNITIES TECHNICAL REPORT

**Section:** 2.5.3 – Pathways to 30x30 Strategy

**Page:** 7

**Reference:** This section describes the goal to protect 30% of California’s lands and waters by 2030.

**Remaining Concern:** The Plan falls short, as SCAG should begin the RAMP now to ensure mitigation and funding is frontloaded or else the RAMP won’t/can’t be successful.

**Comment:** We appreciate the addition of various Pathways to 30x30.

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**Section:** 6.2.1 – Nature-Based Solutions

**Page:** 44

**Comment:** We appreciate the inclusion of “nature” in the nature-based solutions.

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**Section:** 6.3 – Natural and Farmlands Preservation

**Page:** 47

**Reference:** “For natural lands, 25,513 acres are projected to be converted to other uses by 2050 from existing conditions. This represents 35,733 acres less than the Trend/Baseline and is consistent with jurisdictional feedback on locally anticipated growth. With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 22,092,679 acres of degraded habitat – 1,762,284 (7.4%) acres less than the Trend/Baseline. Some areas are improved, however, as Connect SoCal will result in a projected 8,244,485 acres of improved habitat – 361,993 acres more than the Trend/Baseline (4.6%). Note that these numbers represent the sum of individual impacts for each subclass of terrestrial vertebrates, and not the overall cumulative acreage, as natural lands host several different types of species simultaneously in a given area.”

**Comment:** This accounting of acreage impacts is unclear for the average reader. Even with the “Note” explaining the impacts are calculated per

terrestrial vertebrate, the average reader would think 88% of the SCAG's 25M acres are being impacted with this aggregate approach. We suggest quantifying this with the net acreage, such that overlapping areas are not double/triple counted if species impacts are in the same area.

**Page:** 48

**Reference:** "Connect SoCal envisions Regional Advance Mitigation as a key pathway for natural and agricultural lands preservation, which is included as a Regional Strategic Investment that can support conservation as a means of mitigating the environmental impacts of transportation investments."

**Remaining Concern:** We support RAMP being implemented in the first five to seven years of the Plan.

## PROJECT LIST

**Section:** The Project List Table

**Page:** 418

**Reference:** "Advanced Mitigation/Other"

**Remaining Concern:** We urge SCAG to identify implementation opportunities and collaborate with agencies to make RAMP a reality.

## PROGRAM ENVIRONMENTAL IMPACT REPORT

We support the following mitigation measures, but continue to request that these mitigation measures actually reduce the impacts to below a level of significance through direct action instead of simply using indirect actions of planning, information sharing, collaboration, etc. that still have significant and unavoidable impacts on the environment:

- Aesthetics:
  - SMM-GEN-1
  - PMM-AES-3
- Agricultural:
  - SMM-AG-2
  - SMM-AG-3
- Biological Resources:
  - SMM-BIO-1
  - SMM-BIO-2
  - PMM-BIO-1
  - PMM-BIO-2
  - PMM-BIO-3
  - PMM-BIO-4
  - PMM-BIO-5

- PMM-BIO-6

Should you have any questions about our feedback, I can be reached at: (714) 996-1572. Thank you for the opportunity to provide these substantive comments.

Thank you,

*Claire Schlotterbeck*

Claire Schlotterbeck  
Executive Director

## Comments on Connect SoCal

FHBP - Green Vision <greenvision@fhbp.org>

Wed 2024-04-03 12:09 PM

To:2024 PEIR <ConnectSoCalPEIR@scag.ca.gov>;2024 PEIR <ConnectSoCalPEIR@scag.ca.gov>;ePublic Comment Group <ePublicComment@scag.ca.gov>

Cc:SCAG Green Region <scaggreenregion@scag.ca.gov>

📎 1 attachments (939 KB)

FHBP Proposed Final Connect SoCal Letter FINAL 040324.pdf;

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### This Message Is From an Untrusted Sender

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Greetings,

Attached is a letter from Friends of Harbors, Beaches and Parks on Connect SoCal and the environmental documents ahead of tomorrow's meeting. Please confirm receipt of this letter.

Sincerely,

Melanie

**Melanie Schlotterbeck, CMP**  
**GREEN VISION PROJECT COORDINATOR**  
**Friends of Harbors, Beaches and Parks**  
[Melanie@Schlotterbeck.net](mailto:Melanie@Schlotterbeck.net)  
[GreenVision@FHBP.org](mailto:GreenVision@FHBP.org)



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April 3, 2024

Submitted via email to: [ConnectSoCal@scag.ca.gov](mailto:ConnectSoCal@scag.ca.gov), [ConnectSoCalPEIR@scag.ca.gov](mailto:ConnectSoCalPEIR@scag.ca.gov), and [ePublicComment@scag.ca.gov](mailto:ePublicComment@scag.ca.gov)

Attn: Connect SoCal Team, President Art Brown, Regional Council Members  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017

RE: Comments on the Proposed Final 2024 Connect SoCal and Program Environmental Impact Report & Statement

Dear Connect SoCal Team, President Art Brown, and Regional Council members:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) Proposed Final 2024 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) called Connect SoCal and the Program Environmental Impact Report and Statement (PEIR/S). Friends of Harbors, Beaches and Parks (FHBP) provides these comments on the final plan and supports the inclusion of more robust natural and farmland policies, programs, and mitigation measures.

Aside from our comments, we wish to relay our dismay that the public is expected to review thousands of pages of highly technical information in one week prior to a decision that also coincides with a major holiday weekend. After such robust public input in 2023, we urge SCAG to consider the constraints this timing puts on individuals, organizations, and agencies by requiring such a fast turnaround. One idea to resolve this is to stagger the document approvals (PEIR/S in April and Connect SoCal in May). We believe it would allow SCAG to stay in federal conformity as a similar approach was taken in 2020.

Our comments are as follows:

Direct quotes from the Plan are in *italics*.

Proposed policy modifications are underlined.

Our remaining questions and comments are in **bold**.

## ONGOING CONCERNS

SCAG has a significant opportunity with the 2024 Plan, as the State has set ambitious targets for reducing greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) for passenger and light-duty vehicles. The preservation of natural lands can play a crucial role in achieving these

targets. Urban development increases GHG emissions, whereas maintaining natural landscapes allows vegetation and soil to continue sequestering carbon. Preserving Green Region Resource Areas (GRRRA) eliminates the need for VMT for projects that could have been built, thus reducing both GHG emissions and VMT. **SCAG should continue to leverage its political influence to steer development away from GRRRA sites, aligning with its mandate to reduce GHG and VMT.**

Over the past four years, FHBP and others have been actively involved in discussions regarding the SoCal Greenprint and participating in SCAG's Natural and Farmlands Working Group. SCAG is well equipped with leadership, staff, research data, support from conservation groups, and engagement from permitting agencies to move forward with implementing conservation efforts. This presents an opportunity to conserve and restore land across Southern California for the benefit of its large population and meets GHG and VMT goals. **We urge SCAG to aim higher for farmland and natural land conservation goals, which will have considerable direct and indirect benefits.**

## **LAND USE & COMMUNITIES TECHNICAL REPORT**

### **Section 2.4 (California State Wildlife Action Plan (SWAP))**

As we pointed out in our first letter, the most recent SWAP is from 2015, as indicated on page 7. While the SWAP may be a comprehensive document, it is outdated. New species were added in the last eight years and others are being considered for addition to the California/Federal Endangered Species List. **At a minimum, an acknowledgement of the new endangered species and designated critical habitat should be called out in the document, including but not limited to: the Southern California subspecies of mountain lion, the Joshua tree, Crotch's bumble bee, Franklin's bumble bee, Suckley's cuckoo bumble bee, and western bumble bee, among others. The PEIR/S uses much more current data than the Technical Report. The standard should be the same.**

### **Section 2.5 SCAG SCS Land Use Priorities**

We reiterate, given the importance and adoption by SCAG's Regional Council of the SCAG Climate Resolution, **our request that SCAG add policies, strategies, or mitigation measures to reduce disruptions to services from infrastructure damage due to sea level rise.**

### **Section 3.2 (Natural and Farmlands)**

FHBP would like to show our appreciation that SCAG mentions the enormous economic value that farmlands add to the community and local economy. It is therefore concerning that, according to page 11 of the final report, *"Much of the SCAG region has a rich agricultural history, as well, and crop sales continue to bring billions of dollars each year into our local economy; additionally, irrigation from agricultural uses contributes to groundwater supply. From 2012 to 2018, however, new development in areas with long standing agricultural [uses] resulted in farmland decreasing in Southern California by more than 40,000 acres, or 3.5 percent."* **If that trend continues, the rich agricultural history as well as the billions of dollars of annual crop sales will suffer staggering losses in the SCAG region. FHBP will continue to advocate directing new development away from agricultural lands for all the obvious reasons.**

As we highlighted in our previous letter, on page 11, the Report states, “*With abundant desert, mountain, and coastal habitats, some of the highest concentrations of native plant and animal species on the planet are found within our region.*” **As we stated previously, it isn’t just the types of habitats and numbers of flora and fauna—it’s also that these species are found nowhere else on the planet—i.e., they are endemic species. So, it isn’t just quantity, it is also about quality. With the anticipated loss of over 26,880 acres, this equates to a lot of endemic species being lost permanently from the planet. It’s unfortunate that the opportunity to address our unique habitat and our duty to protect these endemic species wasn’t addressed in the report as we requested.**

#### **Section 4.3 Resilience Shocks and Stressors**

FHBP is struck by the absence of sea level rise in the chart on page 19. As we said in our original letter, while sea level rise does cause flooding, it is a distinct issue. Additionally, while aging infrastructure is more prone to damage by sea level rise, the concept of aging infrastructure doesn’t capture the entire picture of damage done via sea level rise. **In the shocks and stressors table, please include “sea level rise” in the shocks column because “flooding” doesn’t adequately capture both concepts. Please include damage to critical infrastructure in the stressors column because “aging infrastructure” doesn’t adequately capture both concepts.**

#### **Section 6.2.2 (Water Resilience)**

As we outlined in our first letter on the draft Land Use and Communities Technical Report, there are huge opportunities to reduce residential water usage for landscaping beyond planting native plants. The Report lists four nature-based solutions on page 44, and our comment focuses on bullet point three. Most drinking water usage in residential zonings is used for landscaping. However, it’s not just the types of plants installed, but the type of water used to support them. Drinking water should never be used on landscaping as it is a waste of this precious resource. **New permits for both residential and commercial projects should require rainwater catchment basins for landscaping purposes and best management practices for low impact development. We recommend those policy objectives be included in this section.**

#### **Section 7.4 Summary of Plan Impacts and Benefits**

The chart on page 60 outlines basic household costs with the trend/baseline compared to the Connect SoCal 2024 Plan. Only transportation and utility costs are included, and **we requested that homeowners and renters insurance be added given not only the skyrocketing rates, but also the scarcity of insurance providers. This cost now represents a much larger piece of household expenditures and it should be included, especially because it’s related to land use decisions.**

### **REMAINING COMMENTS OR QUESTIONS**

#### **CONNECT SOCAL**

##### **1.2 Planning For a Better Tomorrow**

The Plan notes (pg. 13) that SCAG doesn’t directly implement or construct projects, but instead helps facilitate them. The work done to date by SCAG on the SoCal Greenprint and Regional Advance Mitigation Program (RAMP) is a prime example of how SCAG’s leadership can help



facilitate improved regional planning, project implementation, and provide net environmental benefit through the protection of natural resources, while transportation projects and housing are built across the region. **We had hoped to see the next level of planning to carry this theme forward. We again request that SCAG incorporate pilot projects, assist with grant funding, and link those projects in need of mitigation with entities that can identify or manage mitigation lands.**

## **2.2 New and Evolving Trends**

According to the Plan on page 36, “*Resilience is defined as the capacity of the SCAG region’s built, social, economic, and natural systems to anticipate and effectively respond to changing conditions, acute shocks and chronic stressors by creating multiple opportunities for a sustainable, thriving and equitable future.*” As we mentioned in our letter on the draft plan, **FHBP continues to urge SCAG to consider examining resilience to the built environment given the immediate and pressing concerns of sea level rise. Sea level rise is an existing stressor that isn’t subsiding. SCAG must include policies, mitigation measures, and performance measures to examine the vulnerabilities and provide policies that ensure our built systems such as transportation and utilities can withstand the challenges posed by sea level rise. The Plan and various documents mention sea level rise, but fail to provide meaningful analysis. This cannot wait until the next plan.**

As we noted in our previous letter, SCAG and local/regional jurisdictions can plan for many of the shocks and stressors identified in the Plan. (pg. 36) **While the document identified shocks and stressors, it didn’t account for the need to plan for them either through assessments, SWOT analyses, or other methods like climate action plans. We urge SCAG to incorporate direct actions in the Plan.**

Also, the statement from page 36 of the Plan “*Natural systems can adjust and continue to provide essential resources, including clean air and groundwater, and maintain functioning ecosystems,*” seems to indicate that there are no limits to the system’s ability to function. **The natural system has a finite capacity to adapt and this should be acknowledged.**

## **2.3 Regional Challenges**

It is important to note that land availability is an important consideration and factor as it relates to development costs and even natural resource protection, as outlined on page 49. **The concept of land availability was omitted from the constraints listed at the bottom of the paragraph, and should be included.**

## **3.2 Heart of the Plan**

### **Fix-It-First Policy**

Outlined on page 91 of the Plan, “*“Fix-it-First” has been a guiding principle for prioritizing transportation funding in SCAG’s RTPs for the last decade. The cost of rebuilding roadways is 14 times greater than preventative maintenance.*” As we stated in our letter on the draft plan, **FHBP strongly supports this guiding principle for prioritizing transportation funding in SCAG’s RTP because, as identified in the Plan, the cost of rebuilding roadways is vastly greater than preventive maintenance. The Fix-It-First policy should also include planning for the inevitable cost and community impacts to those transportation assets that will be**

most impacted by sea level rise or damaged/destroyed by other climate disasters like wildfire or flooding. We're disappointed language wasn't included in the final plan that encompasses impacts to transportation due to sea level rise and funding identified via Fix-it-First policies to address them.

### 3.3 Regional Planning Policies

#### Mobility (System Preservation & Resilience)

As we said in our letter on the draft plan, *Policy 01 and 02 outlined on page 114 focus on SCAG's Fix-It-First objectives and transportation investments. Existing transportation assets that will be impacted by sea level rise should be included in these policy considerations. We don't see anywhere in any plan documents where sea level rise impacts are analyzed and addressed. Given the very real experiences our coastal regions are facing now, it's a shocking omission to not make addressing sea level rise impacts to transportation infrastructure a well articulated, top priority.*

#### 5.1 Performance Measures

As we said in our previous letter, **this vehicle-centric focus is antithetical to the concept of a 15-minute community** because it urges people to continue to use GHG intensive methods to access parks. **SCAG should focus on a 15-minute walk or ride to a park, meaning SCAG must develop policies encouraging neighborhood parks.** It also runs counter to SCAG's theme of protecting and promoting walkers and bikers through your innovative Go Human campaign. According to SCAG's website, *"Go Human is a community engagement program with the goals of reducing traffic collisions in Southern California and encouraging people to walk and bike more. We hope to create safer and more connected communities by making resources available for engagement, education, information sharing, projects and events."* **These performance measures should be redrafted to focus on pedestrian-oriented access to parks, not only because it meets the stated goals of Connect SoCal 2024, but it also meets the goals of your Go Human Campaign.**

## PROGRAM ENVIRONMENTAL IMPACT REPORT / STATEMENT

### Aesthetics

In the Response to Comments (pg. 8-96), the response stated that the *"SoCal Greenprint is appropriately detailed in a separate SCAG mitigation measure under SMM-AG-3 and repeating it in another measure would not reduce impacts any further."* **Please explain why other topics can be repeated, but not this one. (See the Regional Data Platform listed in SMM-GEN-1 and SMM-POP-1) Please also explain how the SoCal Greenprint provides any direct reduction of agricultural impacts.**

### Biological Resources

Under the Biological Resources section (BIO), SMM-BIO-1, it states (page. 3.4-35), *"SCAG shall support research, programs, and policies that identify, protect, and restore natural habitat corridors and continue support for preserving wildlife corridors and wildlife crossings through information sharing, such as showcasing best practices and regional collaboration forums like SCAG's Natural and Farm Lands Conservation Working Group."* **Please explain how "supporting research, programs, and policies" reduces biological impacts. Active support of conservation projects and initiatives can reduce impacts. SCAG has yet to take that step.**

**Implementing an active mitigation measure will result in quantifiable acreages protected and restored, versus the passive approach taken in the PEIR/S.**

## **PROJECT LIST**

The Project List allocates \$1 billion for RAMP on page 418, with a projected completion date of 2050. RAMP aims to streamline permitting processes ahead of project completion. However, if the anticipated completion date is 2050, no mitigation will have been carried out in advance. **To effectively offset impacts through RAMP, mitigation efforts must be front-loaded with early investment opportunities. SCAG should establish voluntary mitigation programs with interested infrastructure, transportation, and development interests within the next five to seven years, if the agency is genuinely committed to offsetting agricultural and biological resource impacts through RAMP.**

## **AREAS OF SUPPORT**

### **CONNECT SOCAL**

#### **Executive Summary**

We appreciate the inclusion of “preserving natural lands” on page 10 in the Executive Summary.

#### **Section 2.3 Regional Challenges**

##### **Key Community Challenges**

We appreciate the updated information related to “out migration” in this section.

#### **Chapter 2: Our Region Today**

##### **Section: Taking Action**

We appreciate the addition of “non-profits and community organizations” to the list of potential partners for the Collaboration and Policy Leadership section on page 62.

#### **Chapter 3: The Plan**

##### **Environment Implementation Strategies Table**

On page 133, we appreciate the addition of retrofitting existing structures in this context: *“Support implementing agencies’ efforts to include climate-ready home-hardening strategies in new construction as well as the retrofitting of existing structures to minimize the potential loss of housing units stemming from climate-related hazards.”*

## **LAND USE AND COMMUNITIES TECHNICAL REPORT**

### **2.5.3 Pathways to 30x30 Strategy**

We appreciate the added information on SB 337 (protecting 30% of California’s lands and waters by 2030) in the document on page 8. **SCAG has an unprecedented opportunity to align Connect SoCal and its strategies and policies with the existing 30x30 effort and to significantly reduce impacts from this plan. We continue to urge SCAG to capitalize on this opportunity and actively work to implement it locally and regionally.**

### **3.1 Communities and Land Use Patterns**

We appreciate the update to the auto dependent development pattern figures to more current numbers reflecting recent changes, especially with remote work options on page 10: specifically, 67% of work commutes in 2022 being through single occupant vehicles, instead of the original figure of 76% in 2019. FHBP hopes the plan and its policies and strategies will help continue to reduce the work commutes in future years.

### **3.2 Natural and Farm Lands**

On page 11, we appreciate the added language related to the “intrinsic value of nature.”

### **3.3 Climate Hazards**

On pages 13 and 14, we support the revised language about the impacts of sea level rise to communities, infrastructure, and coastal erosion. We also support the added language about Public Safety Power Shutoffs and impacts to infrastructure and the community with these localized/temporary climate events.

### **4.3 Resilience Shocks and Stressors**

On page 19, we appreciate the inclusion of “Aging or Non-Resilient Infrastructure” and “Maladaptive Infrastructure (infrastructure with unintended negative impacts).” This addition helps local and regional agencies understand potential “shock” impacts they may not otherwise be thinking about.

### **6.3 Natural and Farm Lands Preservation**

FHBP continues to support **actual implementation** of RAMP by SCAG as described on page 48.

### **7.4 Summary of Plan Impacts and Benefits**

Similarly in the same table (Table 7.4 - Plan Impacts and Benefits), the cumulative Building Water Use is minimally reduced for both residential and commercial. While we support this, **we urge SCAG to align water reduction strategies with its Water Action Resolution (Resolution No. 22-647-3) as described in Section 2.5.2 SCAG Water Resolution. The reduction isn’t big enough to meet the future anticipated limitations on water and water sources.**

Within this table (7.4) we also noted the modifications made to the fiscal impacts (cumulative) and modification of the name: Respiratory Related Health Costs to Pollution Related Health Costs, as we asked. **However, we are unclear why this number went down.**

As the revised table on page 60 indicates, the new Scenario Planning Model estimates 79 square miles (50,560 acres) to be consumed by business as usual practices, while with the 2024 Connect SoCal Plan only 42 square miles (26,880 acres) will be consumed. Implementing the plan means a considerable reduction in the amount of lands converted to urban uses. This is a much clearer way to describe acres impacted than the paragraph on page 47, which states,

*“For natural lands, 25,513 acres are projected to be converted to other uses by 2050 from existing conditions. This represents 35,733 acres less than the Trend/Baseline and is consistent with jurisdictional feedback on locally anticipated growth. With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 22,092,679 acres of degraded habitat – 1,762,284 (7.4%) acres less than the Trend/Baseline. Some areas are improved, however, as Connect SoCal will result in a projected 8,244,485 acres of improved habitat – 361,993 acres more than the Trend/Baseline (4.6%). Note that these numbers represent the sum of individual impacts for each subclass of terrestrial vertebrates, and not the overall cumulative acreage, as natural lands host several different types of species simultaneously in a given area.” (emphasis added with underline)*

While we’re relieved by the update in acres degraded or restored (as succinctly described on page 60), the preceding paragraph remains unclear and challenging for the public to grasp. Although the presentation aligns with the methodology used in the draft plan as per staff information, it inaccurately inflates the affected acreage by counting overlapping terrestrial vertebrate species impacts (using the aggregate), suggesting a greater impact than reality. Thus, **we strongly advocate for the adoption of a net approach in the 2028 Plan to avoid duplicating acreage impacts and improvements.**

#### **PEIR/S**

FHBP supports the following SCAG Mitigation Measure (SMM) and Project Mitigation Measures (PMM), including: Agriculture (AG), specifically SMM-GEN-1, PMM-AES-3, SMM-AG-2 and -3, and SMM-BIO-1, -2, -3, -4, -5, and -6. **We hope that future Plans, policies, and mitigation measures incorporate more active mitigation that actually reduce the natural and farm land impacts below a level of significance from their present day **\*\*with mitigation\*\*** as an unavoidable significant impact level.**

Thank you for the opportunity to provide these substantive comments on Proposed Final Connect SoCal, the Land Use and Communities Technical Report, Performance Measures, and PEIR/EIS.

Should SCAG have any questions regarding these comments, please contact Melanie Schlotterbeck with Friends of Harbors, Beaches and Parks at (714) 501-3133.

Sincerely,



Michael Wellborn  
President



## Public comment on SCAG Regional Council Agenda Item #2 - Certify the Final PEIR for Connect SoCal 2024

Michael McCarthy <MikeM@radicalresearch.llc>

Wed 2024-04-03 1:10 PM

To:ePublic Comment Group <ePublicComment@scag.ca.gov>

Cc:2Mayor@riversideca.gov <2Mayor@riversideca.gov>;Nava, Marisela <mnav@cityofperris.org>

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April 3, 2024

Southern California Association of Government's Regional Council

Email: [ePublicComment@scag.ca.gov](mailto:ePublicComment@scag.ca.gov)

Honorable Regional Councilmembers,

Thank you for the opportunity to comment on Connect SoCal 2024. My name is Dr. Mike McCarthy.

I urge this council to reconsider its inequitable and environmentally damaging Connect SoCal 2024 PEIR. This programmatic EIR fails to take any action to reduce the growth rate of the Goods Movement industry and, in fact, renders it exempt from any mitigation measures to reduce Truck VMT.

Goods Movement is the largest contributor to air quality problems in the South Coast Air Basin. Goods Movement is responsible for our extreme nonattainment for ozone, our severe nonattainment for PM<sub>2.5</sub> and over half of the inhalation cancer risk through emissions of diesel PM. It is responsible for 15% of greenhouse gas emissions. These emissions disproportionately impact low-income communities of color in the Inland Empire and along Goods Movement corridors from the Ports to the deserts.

Unfortunately, the Connect SoCal 2024 Regional Transportation Plan makes ZERO policy impact on this key sector. Looking at the Plan and No Plan alternatives in Appendix I – Table 4-6 indicates that Heavy-Duty vehicle VMT is 43,000,000 under both categories. The plan does not address Truck VMT at all. Thus, there has been no consideration of improving our air quality or greenhouse gas footprint via the most important sector in this plan, not to mention the noise, congestion, and operational costs of higher volumes of trucks on our roads. SCAG relies on the actions of SCAQMD, CARB, and the EPA to reduce emissions through electrification and cleaner vehicles, while doing nothing to address the underlying activity. Electrification may eventually fix the air quality and reduce the GHG issue, but it will take decades, and SCAG's inaction will delay attainment of the air quality standards and GHG emissions reduction goals. That is not leadership.

Choosing to allow Goods Movement activities (truck VMT, locomotives, ocean-going vessels, cargo aircraft) to grow a rate four times faster than the hyperbolically exaggerated population projections shifts the entirety of the burden of air quality and greenhouse gas emissions reductions from Amazon, Walmart, and other multinational corporations onto the residents of this region and other local industries. That's a disappointing and ridiculous policy. Why are we shifting the entirety of the burden of meeting our regional air quality and climate goals away from the entities doing the most harm?

I trust that you will do your utmost to be responsible stewards of the public trust and reject the certification of this PEIR.

**Mike McCarthy**

Riverside Neighbors Opposing Warehouses  
92508

## Comments for RC Meeting

FHBP - Green Vision <greenvision@fhbp.org>

Wed 2024-04-03 3:06 PM

To:2024 PEIR <ConnectSoCalPEIR@scag.ca.gov>;ConnectSoCal <ConnectSoCal@scag.ca.gov>;ePublic Comment Group <ePublicComment@scag.ca.gov>

Cc:SCAG Green Region <scaggreenregion@scag.ca.gov>

📎 1 attachments (3 MB)

Coalition 2024 Connect SoCal Comment Letter 040324 FINAL.pdf;

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Greetings,

Attached is a letter from the Natural and Farmlands Coalition on Connect SoCal and the environmental documents ahead of tomorrow's meeting. Please confirm receipt of this letter.

Sincerely,

Melanie

**Melanie Schlotterbeck, CMP**  
**GREEN VISION PROJECT COORDINATOR**  
**Friends of Harbors, Beaches and Parks**  
[Melanie@Schlotterbeck.net](mailto:Melanie@Schlotterbeck.net)  
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April 3, 2024

Submitted via email to: [ConnectSoCal@scag.ca.gov](mailto:ConnectSoCal@scag.ca.gov), [ConnectSoCalPEIR@scag.ca.gov](mailto:ConnectSoCalPEIR@scag.ca.gov), and [ePublicComment@scag.ca.gov](mailto:ePublicComment@scag.ca.gov)

Attn: Connect SoCal Team, President Art Brown, Regional Council Members  
 Southern California Association of Governments  
 900 Wilshire Blvd., Ste. 1700  
 Los Angeles, CA 90017

RE: Comments on the Proposed Final 2024 Connect SoCal and Program Environmental Impact Report & Statement

Dear Connect SoCal Team, President Art Brown, and Regional Council members:

Thank you for the opportunity to comment on the SCAG Proposed Final 2024 Regional Transportation Plan and Sustainable Community Strategy, collectively called Connect SoCal (or the Plan) and its associated Program Environmental Impact Report/Statement (PEIR/PEIS). We write with additional comments on the proposed final plan and support the inclusion of more robust natural and farmland policies to reduce, minimize, or mitigate the Plan's impacts considerably.

**The Coalition supports Connect SoCal and its PEIR/PEIS because the loss of agricultural lands and natural lands is considerably less with the Plan in place versus business as usual.**



The State provided ambitious reduction targets for both greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) for passenger and light duty vehicles. SCAG has a tremendous opportunity with the 2024 Plan. **Conservation of natural and farmlands can reduce both GHG and VMT to help SCAG achieve its mandate, and we're glad to see that SCAG encourages development away from Green Region Resource Areas (GRRRA). We urge SCAG to adopt robust measures to protect agricultural and natural lands, as they are effective in reducing vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions.** However, current implementation falls short of maximizing these benefits.

Our comments on the proposed final documents are as follows:

Direct quotes from the Plan/PEIR/PEIS are in *italics*.

Our remaining questions and comments are in **bold**.

## ADDITIONAL QUESTIONS

### CONNECT SOCAL

#### LAND USE AND COMMUNITIES TECHNICAL REPORT

##### 3.3 Climate Hazards

As we pointed out in our original letter, we appreciate that SCAG acknowledges sea level rise in both Connect SoCal and the Land Use and Communities Technical Report. However, we continue to see a lack of deep analysis related to: (1) economic impacts to existing infrastructure and utilities, (2) vulnerabilities of coastal communities, and (3) shocks to transportation. Also, no policies are proposed to address resiliency. With an expected three feet of sea level rise, it's irresponsible to not address the impending impacts to our coastal communities that are already being felt. We can't wait another four years.

We again recommend reviewing the following information for policies and ideas that SCAG should incorporate into the Plan:

Author	Resource
Ocean Protection Council	<a href="#">Sea Level Rise Policy Guidance</a>
California Coastal Commission	<a href="#">Critical Infrastructure</a>

Further, **we believe thoughtful, strategic planning can accommodate both shocks and stressors. SCAG is in the unique position to help jurisdictions do just that and provide funding for the assessments, planning, and mitigation.**

#### LAND USE AND COMMUNITIES TECHNICAL REPORT

##### Section 2.5 SCAG SCS Land Use Priorities

Given the importance and adoption by SCAG's Regional Council of the SCAG Climate Resolution, **we request again that SCAG add mitigation measures for disruptions to services**

**from infrastructure damage due to sea level rise. It is not enough to acknowledge the impact exists. Mitigation measures must be added.**

### **Section 4.3 Resilience Shocks and Stressors**

We reiterate that sea level rise must still be included as a stressor within page 19's chart of shocks and stressors. While we appreciate the addition of aging/non-resilient or mal-adaptive infrastructure, these are not enough when three of SCAG's counties have coastlines, numerous communities, and residents, and will be impacted by sea level rise.

### **Section 7.4 Summary of Plan Impacts and Benefits**

As we outlined in our original letter, we have concerns regarding the data presented in the Land Conservation text on page 47 and chart beginning on page 57.

In the proposed Final Land Use Technical Report on page 47, it states that,

*“For natural lands, 25,513 acres are projected to be converted to other uses by 2050 from existing conditions. This represents 35,733 acres less than the Trend/Baseline and is consistent with jurisdictional feedback on locally anticipated growth. With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 22,092,679 acres of degraded habitat – 1,762,284 (7.4%) acres less than the Trend/Baseline. Some areas are improved, however, as Connect SoCal will result in a projected 8,244,485 acres of improved habitat – 361,993 acres more than the Trend/Baseline (4.6%). Note that these numbers represent the sum of individual impacts for each subclass of terrestrial vertebrates, and not the overall cumulative acreage, as natural lands host several different types of species simultaneously in a given area.” (emphasis added with underline)*

It is our understanding that with comments made on the draft plan, the Scenario Planning Model was rerun and has much better outcomes for natural lands and farmlands. We're relieved to see this; however, the paragraph above is still opaque and difficult for the public to understand. While we learned from staff that this presentation matches the approach used in the draft plan, this approach double counts acreages that have overlapping terrestrial vertebrate species impacts. The result implies more acreage is actually being impacted and/or improved than is actually the case in real life. For example, the entire SCAG region (all six counties) is 25,471,000 acres and the plan indicates that 22,092,679 acres are degraded from Plan impacts. **We highly recommend in the 2028 Plan, the process for counting acreage impacts and improvements be the net (where overlaps are only counted ONCE) and not the present cumulative approach (which counts overlapping impacts multiple times).**

## AREAS OF SUPPORT

We support SCAG's incorporation of the following in the Proposed Final document:

- Protecting 30% of California's lands and waters by 2030 in alignment with Executive Order N-82-20 and SB 337. **SCAG has an unprecedented opportunity to align Connect SoCal and its strategies and policies with the existing 30x30 effort. We collectively urge SCAG to capitalize on this opportunity.** (See Connect SoCal, pg. 218; Land Use and Communities Technical Report, pp. 7 and 44)
- De-emphasizing development in GRRRA. **Not only is it the right thing to do environmentally, it makes sense economically for jurisdictions to build where infrastructure already exists, and given the danger from wildfires coupled with the trend of insurance not providing coverage in the wildland urban interface, SCAG is encouraging sound policy.** (See Land Use and Communities Technical Report, pp. 24, 29, 30 and 35)
- Added language in Section 3 capturing the full scope of these lands' value to our communities and region. **Natural and agricultural lands have considerable value from increasing pollinator habitat to increasing property values and more.** (See Connect SoCal, pg. 107; Land Use and Communities Technical Report, pg. 46)
- Including the SCAG Mitigation Measure (SMM) Agriculture (AG), specifically SMM-AG-2 and SMM-AG-3. **We hope that the recent progress on the SoCal Greenprint allows it to be launched in 2024 with the support of both environmental and building interests.** (See PEIR/PEIS, pg. 3.2-15; Chapter 9 - Clarifications and Revisions, pg. 9-18);
- Adding "wildlife corridors" to the SMM-BIO-4(v) to read: *"Create wildlife corridor redundancy to help maintain functional connectivity and resilience."* **This clarifies SCAG's intent.** (See Chapter 9 - Clarifications and Revisions, pg.9-19)
- Improvements related to building water use (See Land Use and Communities Technical Report, pg. 60), building energy use (pg. 59), land consumption (pg. 59), and total water demand (pg. 45). **Working toward improved water uses and pollution reduction is an important sustainability goal.**

We continue to support the addition of the following in the 2024 Plan, Project List, and PEIR/PEIS:

- Transitioning to implementation of conservation activities. **This is SCAG's opportunity to conserve and restore land throughout Southern California for the benefit of its millions of residents.**
- Implementing a voluntary Regional Advance Mitigation Program (RAMP). The RAMP has an anticipated completion date of 2050. (See Project List, pg. 418) **We sincerely hope to see a RAMP set up in advance – in the next five to seven years to capture the multiple benefits. The mitigation must be front loaded with early investment opportunities to make RAMP work. This is critical for the health and sustainability of the SCAG region.**

Thank you for the opportunity to provide these additional substantive comments on Connect SoCal, the Land Use and Communities Technical Report, Performance Measures, and PEIR/EIS. The Coalition looks forward to reviewing the revised plans.

Should SCAG have any questions regarding these comments, please contact Melanie Schlotterbeck with Friends of Harbors, Beaches and Parks at (714) 501-3133.

Signed,

Michael Wellborn  
President  
Friends of Harbors, Beaches and Parks

Liz O'Donoghue  
Lead, Climate Smart Strategies  
The Nature Conservancy

Lawrence Klementowski  
President  
Chino Hills State Park Interpretive  
Association

Elizabeth Wallace  
President  
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Bettino Rosmarino  
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Terry M. Welsh, MD  
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Dan Silver, MD  
Executive Director  
Endangered Habitats League

Melanie Winter  
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Claire Schlotterbeck  
Executive Director  
Hills For Everyone

Gayle Waite  
President  
Laguna Canyon Conservancy

Elizabeth Lambe  
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Los Cerritos Wetlands Land Trust

Jack Eidt  
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SoCal 350 Climate Action

R Lee Paulson  
President  
Responsible Land Use

Patricia Martz, PhD  
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California Cultural Resource Preservation  
Alliance

Ray Chandos  
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Garry Brown  
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Susan Sheakley  
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President  
OC Habitats

Charles Klobe  
President  
Still Protecting Our Newport