



EXHIBIT B

Findings of Fact for the Connect SoCal Plan



ADOPTED MAY 2020

STATE CLEARINGHOUSE
#20199011061

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1.0 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that a public agency shall not approve or carry out a project for which an Environmental Impact Report (EIR) has been certified that identifies one or more significant adverse environmental effects of a project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. This document presents the findings made by the Southern California Association of Governments (SCAG), in its capacity as the CEQA lead agency, regarding Connect SoCal (Plan or Project) evaluated in the Final Program Environmental Impact Report (Final PEIR) for the Project. In addition, pursuant to Public Resources Code (PRC) section 21081 and CEQA Guidelines section 15093, the existence of significant unavoidable impacts resulting from the Project requires SCAG to prepare a Statement of Overriding Considerations explaining why the agency is willing to accept the unavoidable significant impacts. The Findings of Fact (Findings) reported in the following pages incorporate the facts and discussions of environmental impacts that are described in the Connect SoCal Program Environmental Impact Report (PEIR). Additionally, the Statement of Overriding Considerations (as set forth in Exhibit C), describes the economic, social, environmental, and other benefits of the Plan that override the significant environmental impacts.

For each of the impacts associated with the Plan, the following are provided:

- Description of Impacts – A specific description of the environmental impact identified in the PEIR.
- Mitigation – Identified mitigation measures or actions that are proposed for implementation as part of the project.
- Findings and Rationale – Explanation regarding the adoption of mitigation measures, their implementation, and the short- and long-term benefits related to reduction in criteria air pollutants and per capita reductions in greenhouse gas emissions (GHG), and other economic, social, and environmental benefits that warrant overriding the significant and unavoidable environmental impacts.

Where feasible, mitigation measures have been identified to reduce significant impacts. CEQA requires a mitigation monitoring or reporting program to be adopted by the Lead Agency. SCAG has prepared a Mitigation Monitoring and Reporting Program (MMRP) (as set forth in set forth in Exhibit A), in compliance with the requirements of Section 21081.6 of CEQA to ensure the efficacy of proposed mitigation measures. The PEIR identifies the potentially significant environmental impacts associated with the Plan and specifies measures designed to mitigate adverse environmental impacts. The MMRP includes

procedures to be used to implement the mitigation measures adopted in connection with the certification of the Connect SoCal PEIR and methods of monitoring and reporting.

Because the PEIR presents a region-wide, programmatic level of assessment of existing conditions and potential impacts associated with implementation of Connect SoCal as a whole, this PEIR identifies programmatic mitigation measures for which SCAG would be responsible on a regional scale (these mitigation measures are phrased as “SCAG shall”). In addition, consistent with the provisions of Section 15091(a)(2) of the *State CEQA Guidelines*, SCAG has identified mitigation measures that are within the responsibility and jurisdiction of other public agencies, including lead agencies, and that can and should be considered to mitigate project-level impacts, as applicable and feasible.

The Final Connect SoCal and associated PEIR come at a time of great uncertainty when the region is experiencing severe and devastating impacts of the COVID-19 pandemic. The effect of the pandemic on the region’s economy with millions out of work and thousands of businesses shut down was not anticipated by Connect SoCal or the associated PEIR. At the present time it would be speculative to determine how or even if the Connect SoCal growth forecast for the year 2045 will be impacted. Therefore, the potential impact of the pandemic on future years is not considered new information that would affect the analysis or change the findings for the Connect SoCal PEIR. SCAG will continue to monitor socioeconomic effects of the pandemic and will coordinate with local jurisdictions to assess whether revisions to Connect SoCal are necessary (and provide any appropriate environmental review), as updated information becomes available.

As will be discussed in more detail in the following sections, it is the finding of the SCAG Regional Council that the proposed Final PEIR fulfills environmental review requirements for the Connect SoCal Plan; constitutes a complete, accurate, adequate, and good faith effort at full disclosure under CEQA; and reflects the independent judgment of the SCAG Regional Council.

To assure consistent documentation of its direction at the May 7, 2020 Regional Council meeting regarding Connect SoCal, the Regional Council finds that conforming changes to the enacting resolution, findings and other decisional documents that fully effectuate the direction of the Regional Council, shall be presented to the Regional Council at a subsequent meeting for review and approval. If there is any inconsistency between the enacting resolutions, findings and other decisional documents and the Regional Council direction, the Regional Council direction shall govern.

2.0 PROJECT SUMMARY

2.1 PROJECT LOCATION

The SCAG region consists of six counties that includes Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura, and 191 cities. The total area of the SCAG region is approximately 38,000 square miles. Additionally, the SCAG region consists of 15 sub-regional entities that have been recognized by the Regional Council, SCAG's governing body, as partners in the regional policy planning process. The SCAG region is home to approximately 19 million people. This represents 5.8 percent of the 328 million people in the United States and 48 percent of California's population.¹ 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 U.S.-Mexico border; to the west and south is the county of San Diego; and to the northwest is the Pacific Ocean. The region includes the county with the largest land area in the nation, San Bernardino County; as well as the county with the highest population in the nation, Los Angeles County.

2.2 PROJECT DETAILS

This section provides background information on the RTP/SCS that is updated by SCAG every four years in accordance with applicable federal and state laws. "Connect SoCal" refers to the 2020-2045 RTP/SCS. The terms may be used interchangeably in this subsection.

The Regional Transportation Plan (RTP) is a long-range comprehensive plan for the region's multi-modal transportation. Preparation of the RTP is one of SCAG's primary statutory responsibilities under federal and state law. The RTP is the mechanism used in California by both Metropolitan Planning Organizations (MPOs) and Regional Transportation Planning Agencies (RTPAs) to conduct long-range (at least 20-year) planning in their regions. SCAG must adopt a RTP and update it every four years, or more frequently, if the region is to receive federal or state transportation dollars for public transit, street/road, bicycle, and pedestrian improvements.

State planning law further requires, pursuant to the Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375 or "SB 375"), that an MPO prepare and adopt a Sustainable Communities Strategy (SCS) that sets forth a forecasted regional development pattern that, when integrated with the transportation network, measures, and policies, will reduce greenhouse gas (GHG) emissions from automobiles and light duty trucks. SB 375 is part of California's overall strategy to reach GHG emissions reduction goals as set forth by Assembly Bill (AB) 32 and Executive Orders S-03-05 and B-30-15, by

¹ Connect SoCal Demographics & Growth Report, 2019

promoting integrated transportation and land use planning with the goal of creating more sustainable communities.

The SCS outlines certain land use growth strategies that provide for more integrated land use and transportation planning and maximize transportation investments. In accordance with provisions of SB 375, the SCS developed as part of the RTP cannot dictate local General Plan policies. Rather, SB 375 is intended to provide a regional policy foundation that local government may build upon, if they so choose, and generally includes the quantitative, jurisdiction-level growth projections from each city and county in the region going forward. Additionally, SB 375 provides streamlined environmental review opportunities for eligible projects.²

Over 4,000 multimodal transportation projects, transportation and land use strategies proposed in Connect SoCal represent an investment of over \$638 billion over the next 25 years. 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.

The Plan includes a growth forecast with population, household and employment growth anticipated to occur in the SCAG region by 2045; a transportation network including a list of transportation projects in the region; and a forecasted development pattern with land use and transportation strategies that the region could pursue over the Plan horizon. The Plan was developed to achieve targets for greenhouse (GHG) emissions reductions (19 percent per capita reduction), consistent with SB 375 and other regional goals.

Implementation of the Plan's land use development pattern would accommodate 51 percent of the region's future household growth and 60 percent of future employment growth in designated High-Quality Transit Areas (HQTAs). Over twice as many households will live in high-quality transit opportunity areas under the Plan compared with existing conditions. In 2018, 55 percent of total housing units were single-family units and 45 percent were multi-family units. The Plan projects that in 2045, 31 percent of new homes in the SCAG region will be single-family units and 69 percent multi-family units. In 2045, 29 percent of households are anticipated to be large-lot single-family units, 20 percent small-lot single-family units, 8 percent townhome units, and 42 percent multi-family units.

² CEQA streamlining provisions are also available for eligible projects meeting the criteria established by Senate Bill 226 (Simitian, 2011), CEQA Guidelines Section 15183.3 (Streamlining for Infill Projects) and for eligible projects meeting the criteria established by Senate Bill 743 (Steinberg, 2013), Public Resources Code Section 21155.4 (Exemptions).

2.3 PROJECT GOALS AND GUIDING PRINCIPLES

SCAG developed goals for Connect SoCal, which fall into four core categories: economy, mobility, environment and healthy/complete communities. The Plan lays out goals related to housing, transportation technologies, equity and resilience in order to adequately reflect the increasing importance of these topics in the region, and where possible the goals have been developed to link to potential performance measures and targets (see **Table B-1**). The Plan’s guiding policies magnify these goals, creating a specific direction for Plan investments (see **Table B-2**).

Table B-1
Connect SoCal Goals

Connect SoCal 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 critical habitats.

Source: Final Connect SoCal Plan

Table B-2
Connect SoCal Guiding Principles

Connect SoCal Guiding Principles	
1	Connect SoCal will be adopted at the jurisdictional level, and directly reflects the population, household and employment growth projects that have been reviewed and refined with feedback from local jurisdictions through SCAG’s Bottom-Up Local Input and Envisioning Process. The growth forecast maintains these locally informed projected jurisdictional growth totals, meaning future growth is not reallocated from one local jurisdiction to another.
2	Connect SoCal’s growth forecast at the Transportation Analysis Zone (TAZ) level is controlled to not exceed the maximum density of local general plans, except in the case of existing entitlements and development agreements.
3	For the purpose of determining consistency with Connect SoCal for the California Environmental Quality Act (CEQA), grand or other opportunities, lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency; SCAG may also evaluate consistency for grants and other resource opportunities; consistency should be evaluated utilizing the goals and policies of Connect SoCal and its associated Program Environmental Impact Report (PEIR).
4	TAZ level data or any data at a geography smaller than the jurisdictional level has been utilized to conduct required modeling analysis and is therefore advisory only and non-binding, given that sub-jurisdictional forecasts are not adopted as part of Connect SoCal. TAZ level data may be used by jurisdictions in local planning as they seem appropriate and Connect SoCal does not supersede local jurisdiction authority or decisions on future development,

Connect SoCal Guiding Principles

- including entitlements and development agreements. There is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with Connect SoCal.
- 5 SCAG will maintain communication with agencies that use SCAG's sub-jurisdictional level data to ensure that the "advisory and non-binding" nature of the data is appropriately maintained.

Source: Final Connect SoCal Plan

2.4 CONTENTS OF THE CONNECT SOCIAL PLAN

Connect SoCal is organized into the following Chapters:

0. Making Connections – an introduction to the Plan
1. About the Plan – a description of the Plan including goals and guiding principles and description of how the Plan was developed as well as identification of the laws that guide the Plan.
2. SoCal Today – identification of major trends, population and demographic changes, regional growth, a description of the transportation system (and mode choices), identification of farmland lost and at-risk, discussion of transportation safety, discussion of public health, discussion of access and mobility, funding, planning for disruption and moving towards solutions.
3. A Path to Greater Access, Mobility and Sustainability – a description of the proposed transportation strategies and sustainable communities strategies
4. Paying Our Way Forward – a description of how the transportation projects are anticipated to be financed.
5. Measuring Our Progress – identification of how the performance of the Plan is measured.
6. Looking Ahead – a summary of the challenges that lie ahead.

The Plan also includes the following supplemental technical reports:

- Active Transportation
- Aviation and Airport Ground Access
- Congestion Management (including a TDM Toolbox of Strategies)
- Demographics and Growth Forecast
- Economic and Job Creation Analysis

- Emerging Technologies
- Environmental Justice
- Goods Movement
- Highways and Arterials
- Natural and Farm Lands Conservation
- Passenger Rail
- Performance Measures
- Project List
- Public Health
- Public Participation and Consultation
- Sustainable Communities Strategy
- Transit
- Transportation Conformity Analysis
- Transportation Finance
- Transportation, Safety and Security

3.0 FINDINGS REQUIRED UNDER CEQA

3.1 SUMMARY OF FINDINGS OF FACT

Less than Significant Impacts

As described in **Section 4.0, Findings Regarding Potential Environmental Effects That Are Less than Significant**, of this Findings of Fact, the impacts of the Connect SoCal Plan were determined to be less than significant in the following environmental resource categories:

- 3.3 Air Quality (AQ-1 and -4)
- 3.6 Energy (ENR-1 and -2)
- 3.7 Geology and Soils (GEO-1, -3, -4, and -5)
- 3.17 Transportation, Traffic, and Safety (TRA-1 and -3)

Significant Impacts

Findings Pursuant to Section 15091(a) of the State CEQA Guidelines

Consistent with the provisions of Section 15091(a)(1), changes and alterations have been required in, or incorporated into, the Plan, including SCAG mitigation measures, to avoid or substantially lessen the significant environmental effects of the Plan. SCAG has carefully considered the anticipated significant and unavoidable impacts of the Plan, as well as the benefits of adoption of the Plan. The benefits are as follows:

Overall, the transportation investments in the Connect SoCal Plan will provide a return of \$1.54 for every dollar invested. Compared with an alternative of not adopting the Plan, the Plan would accomplish the following:

- The Plan would reach the target of reducing greenhouse gas levels by 8 percent per capita by 2020 and 19 percent by 2035 compared to 2005 levels. This would exceed the state's mandated of 19 percent by 2035.
- Regional air quality would improve under the Plan, as cleaner fuels and new vehicle technologies would help to significantly reduce many of the pollutants that contribute to smog and other airborne contaminants that may impact public health in the region.
- By 2045 public transit boardings are projected to more than double in absolute numbers, and transit's mode share will also rise. The share of trips by bicycle and walking will rise and such active modes as well as transit will represent 12.9 percent of all trips.

- The Plan would result in an increase in the percentage of the region's total household and employment growth occurring within Growth Priority Areas, from 58 percent to 60 percent and 70 percent to 72 percent, respectively.
- The number of vehicle miles traveled (VMT) per capita would be reduced by 4.6 percent less total regional VMT when compared to a no project scenario.
- The Plan would decrease regional VMT per capita (24.19 miles to 23.08 miles) and person hours of delay per capita (0.19 hours to 0.14 hours).
- 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; delay hours for heavy duty trucks on highways and arterials; and mean commute time for all modes.
- The share of all trips using a travel mode other than single-occupancy vehicles would increase from 62.8 percent to 64.9 percent.
- The Plan would generate 264,000 new jobs annually due to improved regional economic competitiveness and 168,400 new jobs due to investments in her regional transportation system.
- The Plan would decrease the total amount of greenfield land consumed, from 64,120 acres to 45,360 acres.
- The Plan would result in 27.5 percent less area converted from agriculture to urban consumption when compared to the No Project Alternative (26,650 acres to 19,330 acres).
- The Plan would result in less energy and water used by residential and commercial buildings. Energy use would decrease by 0.89 percent when compared to the No Project Alternative (15,546 trillion Btu to 15,408 trillion Btu). Water use would decrease by 1.8 percent when compared to the No Project Alternative (89,712,225 acre-feet to 88,904,522 acre-feet).

Consistent with the provisions of Section 15091(a)(2), changes and alterations capable of avoiding or substantially lessening the significant environmental effects of the Plan, identified as project-level mitigation measures, are within the responsibility and jurisdiction of lead agencies that will consider subsequent project-level approvals of transportation and development projects. SCAG has no authority to require specific mitigation measures at the project level given that local lead agencies have the sole discretion to determine which mitigation measures are applicable and feasible based on the location-specific circumstances. Nevertheless, SCAG reasonably assumes that local lead agencies do, and will continue to, exercise their discretionary authority (through local land use and other project permits and

approvals) to implement sufficient feasible mitigation measures (and alternatives) identified through the CEQA process to avoid or reduce to the maximum extent practicable and feasible the significant direct, indirect, and cumulative impacts of subsequent projects.

In addition, state planning law 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 (Govt. Code §65080(b)(2)(K)). 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, the zoning law, and the Subdivision Map Act (Govt. Code §§65100–65763; Govt. Code §§65800–65912; Govt. Code §§66410–66499.37). With respect to the transportation projects in the Connect SoCal 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. As such, SCAG, as a lead agency, has a responsibility to identify feasible mitigation measures that are capable of avoiding or reducing the direct, indirect, and cumulative significant impacts of the Plan that can and should be considered by public agencies in their related discretionary decision related to subsequent project, including related reviews and consideration by trustee and responsible agencies. With respect to the Plan, SCAG has identified project level mitigation measures, or other comparable measures, which “can and should” be applied at the project level to reduce impacts. Because project-mitigation activities are within the responsibility and jurisdiction of local and other agencies, the Regional Council hereby finds that such agencies “can and should” comply with the requirements of CEQA to mitigate the environmental impacts of the individual projects, as applicable and feasible. The Regional Council further finds that the project-level mitigation measures imposed by local and other agencies will collectively reduce the environmental impact, at the regional level, to the maximum extent practicable and feasible.

Significant and Unavoidable Impacts

As described in **Section 4.0, Findings Regarding Significant Unavoidable Adverse Impacts that Cannot Be Mitigated to a Level of Less than Significant**, of this Findings of Fact, the Plan was determined to have the potential to result in significant and unavoidable impacts in the following environmental resource categories:

- 3.1 Aesthetics (AES-1, -2, -3, and -4)
- 3.2 Agriculture and Forestry Resources (AG-1, -2, -3, -4, and -5)
- 3.3 Air Quality (AQ-2, -3, and -4)
- 3.4 Biological Resources (BIO-1, -2, -3, -4, -5, and -6)
- 3.5 Cultural Resources (CULT-1, -2, -3)
- 3.7 Geology and Soils (GEO-2 and -6)
- 3.8 Greenhouse Gas Emissions and Climate Change (GHG-1 and -2)

- 3.9 Hazards and Hazardous Materials (HAZ-1, -2, -3, -4, -5, -6, and -7)
- 3.10 Hydrology and Water Quality (HYD-1, -2, -3 -4, and -5)
- 3.11 Land Use and Planning (LU-1 and -2)
- 3.12 Mineral Resources (MIN-1 and -2)
- 3.13 Noise (NOISE-1, -2, and -3)
- 3.14 Population, Housing, and Employment (POP-1 and -2)
- 3.15 Public Services (PSF-1, PSP-1, PSS-1, and PSL-1)
- 3.16 Parks and Recreation (REC-1 and -2)
- 3.17 Transportation, Traffic, and Safety (TRA-2 and -4)
- 3.18 Tribal Cultural Resources (TCR-1)
- 3.19 Utilities and Service Systems (USSW-1 and -2; USWW-1 and -2 and; USWS-1 and -2)
- 3.20 Wildfire (WF-1 and -2)

3.2 CEQA ENVIRONMENTAL REVIEW

The basic purposes of CEQA are to (1) inform decision makers and the public about the potential, significant adverse environmental effects of proposed governmental decisions and activities, (2) identify the ways those environmental effects can be avoided or significantly reduced, (3) prevent significant, avoidable and adverse environmental effects by requiring changes in projects through the use of alternatives or mitigation measures when feasible, and (4) disclose to the public the reasons why an implementing agency may approve a project even if significant unavoidable environmental effects are involved.

An EIR uses a multidisciplinary approach, applying social and natural sciences to make a qualitative and quantitative analysis of all the foreseeable environmental impacts that a project might exert. As stated in CEQA Guidelines section 15151:

An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.

This Final EIR has been prepared in accordance with CEQA as amended (PRC section 21000 *et seq.*) and CEQA Guidelines (California Code of Regulations, title 14, section 15000 *et seq.*). The Final PEIR incorporates, by reference, the Draft EIR (State Clearinghouse No. 20199011061) prepared by SCAG for the Connect SoCal Plan as it was originally published. In accordance with Section 15132 of the *CEQA Guidelines*, the Final EIR shall consist of the following:

The Draft PEIR or a revision of the draft.

- Comments and recommendations received on the Draft PEIR either verbatim or in summary.
- A list of persons, organizations, and public agencies commenting on the Draft PEIR.
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- Any other information added by the Lead Agency.

Before SCAG may approve the Project, it must certify the Final PEIR: a) has been completed in compliance with CEQA; b) was presented to the Regional Council who reviewed and considered it prior to approving the Project; and c) reflects SCAG's independent judgment and analysis (CEQA Guidelines section 15090).

Section 15004 of the CEQA Guidelines states before the approval of any project subject to CEQA, the Lead Agency must consider the final environmental document, which in this case is the Final PEIR.

Notice of Preparation and Public Scoping

A Notice of Preparation (NOP) for this PEIR was issued on January 23, 2019 by SCAG for a 30-day public review period. Two scoping meetings were held on February 13, 2019 at 3:00 pm to 5:00 pm, and at 6:30 pm to 8:00 pm. The meetings were convened in the SCAG's main office in Los Angeles, with videoconferencing available at SCAG regional offices in Imperial, Orange, Riverside, and San Bernardino Counties. Videoconferencing was made available at two additional locations in the Cities of Palm Desert (Coachella Valley Association of Governments) and Palmdale. The purpose of these meetings was to provide early consultation for the public to express their concerns about the project and acquire information and make recommendations on issues to be addressed in the PEIR.

The NOP was sent to the State Clearinghouse on January 23, 2019; posted with 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 NOP was made available on SCAG's website at <https://www.connectso-cal.org/Documents/PEIR/NOP-PEIR-ConnectSoCal.pdf>. The NOP was published in 12 newspapers, including the Los Angeles Times, and additional newspapers that address the large geographic reach and diverse population within the SCAG region.

SCAG also conducted 28 open house workshops on the Plan between June and July 2019. These goals of these events was to share the purpose of Connect SoCal, introduce and provide information on policies and strategies under consideration, describe the performance outcomes of the different policy choices and receive input from participants.

Notice of Availability of the Draft PEIR

The Draft 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. 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.

A public workshop was held on January 9, 2020 from 2:00 pm to 3:30 pm at SCAG's Los Angeles Office located at 900 Wilshire Blvd., Ste 1700. This workshop was also a webinar which was available for the public via internet.

Response to Comments on the Draft PEIR

CEQA Guidelines, section 15088 requires SCAG to evaluate comments on significant environmental issues received from parties that have reviewed the Draft PEIR and to prepare a written response. As stated in CEQA Guidelines, sections 15132 and 15362, the Final PEIR must contain the comments received on the Draft PEIR, either verbatim or in summary, a list of persons commenting, and the response of the Lead Agency to the comments received.

A total of 53 comment letters were received by SCAG during the comment period. Among the 53 comment letters, there were 262 unique comments directly related to the Draft PEIR.³ The responses do not significantly alter the Project, change the Draft PEIR's significance conclusions, or provide new information regarding substantial adverse environmental effects not already analyzed in the Draft PEIR. Instead, the information presented in the responses to comments "merely clarifies or amplifies or makes insignificant modifications" in the Draft PEIR, as is permitted by CEQA Guidelines, subdivision 15088.5(b).

In the course of responding to comments, certain portions of the Draft PEIR have been modified slightly for further clarification. The comments and modifications have not identified the existence of: (1) a significant new environmental impact that would result from the Project or an adopted mitigation measure; (2) a substantial increase in the severity of an environmental impact; (3) a feasible project alternative or mitigation measure not adopted that is considerably different from others analyzed in the Draft PEIR that would clearly lessen the significant environmental impacts of the Project; or (4) information that indicates the public was deprived of a meaningful opportunity to review and comment on the Draft PEIR (CEQA Guidelines, subdivision 15088.5(a)). Consequently, SCAG finds the clarifications made to the Draft EIR in the Final EIR do not collectively or individually constitute significant new information within the meaning of PRC, section 21092.1 and CEQA Guidelines, section 15088.5. Recirculation of the Draft PEIR or any portion thereof, is, therefore, not required.

³ SCAG received a total 327 comments, 66 of which were considered redundant (i.e., cross-referencing comments from other local jurisdictions or agencies). A complete list and copy of comments are provided in the Final PEIR.

The written responses to commenting public agencies shall be provided at least ten (10) days prior to the certification of the Draft PEIR (CEQA Guidelines § 15088(b)). SCAG provided the Final PEIR to commenters on **March 27, 2020**, and made the document available for review on the Project web site at: <http://scagrtpscscs.net/Pages/PROPOSEDFINAL2016PEIR.aspx>.

3.3 GENERAL FINDINGS

Pursuant to Public Resources Code Section 21081 and *CEQA Guidelines* Section §15091, no public agency shall approve or carry out a project, for which an EIR has been certified, that identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

- Changes or alterations have been required in, or incorporated into, the project, which mitigate or avoid the significant effects on the environment.
- Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
- Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (The concept of infeasibility also encompasses whether a particular alternative or mitigation measure promotes the Project's underlying goals and objectives, and whether an alternative or mitigation measure is impractical or undesirable from a policy standpoint.) See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957; *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410.

SCAG has made one or more of these specific written findings regarding each significant impact associated with the Project. Those findings are in **Sections 6.0, Findings Regarding Significant Unavoidable Adverse Impacts that Cannot Be Mitigated to a Level of Less than Significant**, and **7.0, Findings Regarding Alternatives, of this Findings of Fact**, along with a presentation of facts in support of the findings. The Regional Council certifies these findings are based on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental issues identified and discussed.

The Connect SoCal PEIR has been prepared as a Program EIR pursuant to *CEQA Guidelines* Section 15168. The degree of specificity in the PEIR corresponds to the specificity of the regional goals, policies, and strategies of the Plan. The PEIR approached the Plan as one Project under CEQA, as a whole. The PEIR included an appropriately detailed and conservative (i.e., in a worst-case scenario) analysis of 20

environmental topics for the Project and its alternatives. The PEIR disclosed the environmental impacts expected to result from the adoption and implementation of the Plan. Feasible mitigation measures were identified to avoid or minimize significant environmental effects.

The adopted mitigation measures within the responsibility of SCAG appropriately mitigate impacts of the Connect SoCal Plan at the regional/programmatic level. The project-level mitigation measures adopted as part of the Plan can and should be implemented by lead agencies, as feasible and appropriate, to mitigate impacts at the project-level. Together, these mitigation measures mitigate the environmental impacts of the Plan to the maximum extent feasible as discussed in the findings made in **Section 6.0, Findings Regarding Significant Unavoidable Adverse Impacts that Cannot Be Mitigated to a Level of Less than Significant**, of this Findings of Fact and Statement of Overriding Considerations. The Findings in Section 6.0 indicate where mitigation measures may not be capable of reducing impacts to below the level of significance.

In response to comments received, SCAG provided clarifications and revisions to the information contained in the Draft PEIR that was circulated for public review. All such changes made to the Draft PEIR are shown in the Final PEIR (**Chapter 10.0, Corrections and Additions**).

Since circulation of the Draft PEIR for public review, between publication of the Draft Connect SoCal and Final Connect SoCal, updates to the Plan have been made. Updates were based on comments received during the comment period, input received through the outreach process, new data and information that became available after the draft was released and an additional internal review process. A copy of the Final Connect SoCal plan is available at: <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>.

Comments and input received through this process have assisted staff in refining and improving the final document, the underlying goals, objectives, policies as well as plan outcomes either improved or remained relatively unchanged between the draft and the final. A summary of key revisions between the Draft and proposed Final Connect SoCal that are reassessed in the proposed Final PEIR are provided below:

Modifications to the Connect SoCal Project List: As part of the Connect SoCal development process, the Draft Connect SoCal Project List has been updated since the publication of the Draft Plan and Draft PEIR. Generally, changes to the project list are as follows:

- New projects that were not included in the Connect SoCal Project List.
- Existing projects in the Project List that were requested to be removed.
- Existing projects in the Project List that have:
 - A revised description,

- A revised schedule, and
- Included a combination of above changes.

SCAG received input on the Draft Project List from six County Transportation Commissions (CTCs) as part of the Connect SoCal update and finalization process. During the comment period for the Draft Plan, input was received from the six CTC's regarding modifications to the Final Project List. The provided updates reflect the latest project information at the time as part of the finalization process for the Final Connect SoCal Project List. Connect SoCal includes more than 4,000 individual capital projects and programs across the region across all modes of transportation over the next 25 years. During the public review period, SCAG received requests from the CTCs to modify more than 170 (which represents less than 1 percent of total projects) projects. Projects removed were due to duplicative entries. Project changes between the draft and the final were changes to an existing project's completion year, project cost or a minor change to the project's scope of work. Accordingly, SCAG re-ran the travel demand and emission model with the updated transportation network and SCS as discussed below. The plan outcome from these revisions resulted in improvement in VMT, delay and economic metrics which are further discussed under the changes to Performance Measures section of the Final Connect SoCal Plan.

Improvements to Performance Outcome: Comments were received from the California Air Resources Board (ARB) on performance outcomes and greenhouse gases (GHG) reduction target analysis. In response, SCAG added data for the years 2020 and 2035 for the VMT per capita performance measure to better align with state GHG reduction target years in the main book as well as Performance Measures Technical Report. In addition, final modeling data results from both the SCAG Regional Travel Demand Model and the Scenario Planning Model offered improved performance in some significant areas of Connect SoCal, including VMT per capita (5.0% reduction from 4.2%) and daily delay per capita (25.7% reduction from 22.4%). Several of the economic opportunity indicators were also improved by the final model runs, with the benefit/cost ratio for Connect SoCal investments increasing from 1.54 to 2.06, and the annual number of new jobs generated by improved regional economic competitiveness increasing from 195,500 to 264,500.

Adjustments to the Sustainable Communities Strategy: SCAG received many comments related to the SCS. Several comments raised concerns regarding housing affordability, climate change and certain GHG reduction strategies. Other comments sought clarity on the Connect SoCal Growth Vision. In response to comments, the SCS reflects revisions in the Forecasted Regional Development Pattern, which is updated due to feedback from jurisdictions and other stakeholders.

SCAG used the performance of each scenario as well as input gathered through the public workshops to refine the Growth Vision and Forecasted Development Pattern for the Plan, which aims to increase mobility

options and reduce the need for residents to drive by locating housing, jobs, and transit closer together. The final Plan focuses growth within jurisdictions near destinations and mobility options and promotes an improved jobs-housing balance to reduce commute times.

SCAG revised Connect SoCal's Forecasted Regional Development Pattern, by initiating a peer review with local jurisdictions regarding population, household, and employment growth at the sub-jurisdictional level (i.e. transportation analysis zone (TAZ) level) prior to the release of the draft Connect SoCal plan. SCAG provided jurisdictions the opportunity to review and provide feedback to SCAG over a six-week timeframe, with requested revisions due to SCAG by December 11, 2019. From this engagement, technical refinements were made to the Forecasted Regional Development Pattern in Connect SoCal that included adjustments to growth due to entitlements and maximum planned capacities. Fifty jurisdictions requested revisions, and the majority participating in this exercise indicated that growth projections provided to SCAG in 2018 as part of the Bottom-Up Local Input and Envisioning Process were the most accurate reflection of entitlements and their phasing through the Plan's horizon of 2045. Taking this feedback, SCAG evaluated the locally provided, neighborhood level growth forecast data alongside the draft dataset for Connect SoCal to determine which dataset best reflected the policies and principles of the draft plan. Specifically, this involved analyzing each jurisdiction's concentration of growth in the draft plan's priority growth and constrained areas. As a result, SCAG replaced the draft plan data with the original local, neighborhood-level growth forecast data in approximately one third of jurisdictions, including unincorporated Los Angeles County. See Connect SoCal's Process for Incorporating Entitlements, located at: <https://www.connectsocial.org/Documents/DataMapBooks/Incorporating-Entitlements-Process.pdf>

The revised Forecasted Regional Development Pattern brings forward data elements provided by jurisdictions in 2018 during the Bottom-Up Local Input and Envisioning Process - including entitled projects and phasing, reflects "locally envisioned" jurisdictional growth totals detailed in the Demographics and Growth Forecast Technical Report and allocates growth within existing planned maximum densities as conveyed by jurisdictions. Consistent with the policies and principles of the draft plan, the revised Forecasted Regional Development Pattern directs growth to Priority Growth Areas (PGAs) near existing and planned transit, within existing job centers, in communities with existing and planned infrastructure to support more walkability and use of alternative transportation modes, and in areas identified for jurisdictional expansion (i.e. spheres of influence). Growth through 2045 was reduced in and redirected from constrained areas within a jurisdiction (e.g. very high severity fire risk areas, farmland, protected open space, wildlife corridors, areas at risk for near-term sea level rise, flood hazard areas, etc.). To ensure transparency during the process to finalize the Forecasted Development Pattern for Connect SoCal, SCAG emailed a letter to each jurisdiction starting February 21, 2020 that included a detailed methodology document for SCAG's Growth Vision (For further details please refer to the Connect

SoCal Growth Vision Methodology located at:
<https://www.connectsocal.org/Documents/DataMapBooks/Growth-Vision-Methodology.pdf>.

Jurisdictions were also given access to their jurisdictional and neighborhood level Forecasted Development Pattern data via SCAG's Scenario Planning Model - Data Management Site. Throughout this effort, SCAG engaged with stakeholders from the Technical Working Group, and provided an update on the peer review exercise to the Community, Economic, and Human Development Policy Committee. It should be emphasized that Connect SoCal does not supersede local jurisdiction land use authority or decisions on future development, including entitlements and development agreements. Use of SCAG's neighborhood level Forecasted Development Pattern data for project level CEQA analysis is at the discretion of the lead agency and/or lead applicant. No changes were made to the underlying policies or strategies presented in the Connect SoCal Plan that would constitute a major change in the Project Description.

Modifications to Transportation Finance: The Connect SoCal proposes investment of almost \$639 billion to maintain, operate and improve the region's multimodal transportation system over the next 25 years through 2045. Approximately \$500 billion is expected to be available through existing funding sources projected out to 2045. The balance of almost \$139 billion is expected to be available through implementation of innovative funding sources proposed in the Connect SoCal Plan, which will require significant actions at the local, regional, state and federal level in the coming decade through collaborative efforts. Many comments were focused on clarifying details on the financial model, implementation guidelines for new revenue sources and need for more evaluation, including assurances on distribution of funds and consideration of impacts of fees on different segments of the population. In response to comments, text clarifications were made regarding assumptions for the financial model and guidelines for implementation of new revenue sources. Modifications to transportation finance does not affect the environmental analysis as it serves to provide the reader background information on funding sources rather than information on physical changes to the environment.

Clarifications on Transportation Conformity: On the Transportation Conformity Analysis Technical Report, in response to comments, a new challenge entitled "Meeting Federal Air Quality Standards" has been added to Chapter 2 of the Connect SoCal Plan to highlight the challenge for the South Coast region to meet federal air quality standards by the near-term statutory deadline, its potential impacts, and the need for a comprehensive and coordinated regional solution. In the interim, the United States Environmental Protection Agency (EPA) recently approved emissions adjustment factors proposed by ARB to EMFAC 2014 (which is the emissions model used by SCAG to demonstrate transportation conformity of the Draft Connect SoCal, prior to issuance of SAFE Rules by US EPA) to comply with SAFE Rule Part 1 for transportation conformity determination in California. The Final Plan uses adjusted factors with respect to

air quality emissions and meets the required conformity tests pursuant to the proposed adjustment factors to the EMFAC 2014.

Additional information was identified in the comments to the Draft PEIR and responded to in Chapter 9.0, Response to Comments on the Draft Program Environmental Impact Report, of the Final PEIR with clarifications and revisions in Chapter 10.0, Corrections and Additions, of the Final PEIR.

The SCAG models described previously are used to provide gross estimates of regional environmental parameters (VMT, criteria pollutant emissions and GHG emissions). However, the inputs to these models are subject to variability (location and density of land uses, travel patterns, fuel make up, pricing assumptions and many more). Because of this, minor changes to assumptions result in minor changes to modeling results and are not statistically significant. As noted above, SCAG has made several refinements to the Connect SoCal Plan including to land use patterns, transportation projects and policies (alternatives would be similarly affected). None of these refinements result in significant changes to the information presented in the Draft PEIR, including modeling results.

Furthermore, these changes and additional information do not result in a finding of a new impact that was not analyzed in the Draft PEIR or result in a substantial increase in the severity of a significant impact identified in the Draft PEIR. They do not affect the conclusions regarding the significance of the impacts contained in the Draft PEIR. Thus, it is the finding of SCAG Regional Council that such changes and the corrections and additions as described in the Final PEIR are clarifying in nature, and do not present any significant new information requiring recirculation or additional environmental review pursuant to *CEQA Guidelines* Section 15088.5.

A Mitigation Monitoring and Reporting Program (MMRP) for the Plan has been prepared pursuant to the requirements of Public Resources Code Section 21081.6 and *CEQA Guidelines* Section 15091 (d) and Section 15097 to ensure implementation of the adopted mitigation measures to reduce significant effects on the environment, and is included in the Final PEIR document. SCAG is the custodian of the documents and other material that constitute the record of the proceedings upon which certification of the PEIR for the Plan is based, as described below in **Section 9.0, Findings Regarding Location and Custodian of Documents**, of this Findings of Fact.

It is the finding of SCAG Regional Council that the proposed Final PEIR fulfills environmental review requirements for the Connect SoCal Plan; that the document constitutes a complete, accurate, adequate, and good faith effort at full disclosure under CEQA; and that the document reflects the independent judgment of the SCAG Regional Council.

4.0 FINDINGS REGARDING POTENTIAL ENVIRONMENTAL EFFECTS THAT ARE LESS THAN SIGNIFICANT

The analysis undertaken in support of the PEIR concludes that the impacts of the Plan were determined to be less than significant in the following environmental resource categories and that no mitigation would be required:

- 4.1 Air Quality (AQ-1 and -4)
- 4.2 Energy (ENR-1 and -2)
- 4.3 Geology and Soils (GEO-1, -3, -4, and -5)
- 4.4 Transportation, Traffic, and Safety (TRA-1 and -3)

4.1 AIR QUALITY

Impact AQ-1 **Potential to conflict with or obstruct implementation of the applicable air quality plan.**

Impact:

Less than significant

Finding:

The Plan would result in less than significant impacts. Therefore, no mitigation is required.

Rationale:

The above finding is made based on the analysis included in Section 3.3, Air Quality, of the PEIR. The federal Clean Air Act (CAA) sets the National Ambient Air Quality Standards (NAAQS) for the main criteria air pollutants: nitrogen oxides (NO_x), volatile organic compounds (VOCs), particulate matter (PM_{2.5} and PM₁₀), sulfur oxides (SO_x), carbon monoxide (CO), and lead (Pb). Attainment and nonattainment of the NAAQS is variable throughout the counties within the SCAG region (1) Pb in the Los Angeles County portion of the South Coast Air Basin; (2) PM_{2.5} in Imperial, Los Angeles, Orange, Riverside, and San Bernardino Counties; (3) PM₁₀ in Imperial, Riverside, and San Bernardino Counties; and ozone in all counties.⁴ The analysis considered a review of the California Ambient Air Quality Area Designations for the six counties in the SCAG Region: Imperial, Los Angeles, Orange, Riverside, San

⁴ U.S. Environmental Protection Agency. 30 January 2015. U.S. EPA green book. Current nonattainment counties for all criteria pollutants. Available at: <http://www.epa.gov/oaqps001/greenbk/ancl.html>

Bernardino, and Ventura.⁵ 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. 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.

Impact AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Impact:

Less than significant

Finding:

The Plan would result in less than significant impacts. Therefore, no mitigation is required.

Rationale:

The above finding is made based on the analysis included in Section 3.3, Air Quality, of the PEIR. Odor sources within the SCAG region, such as agricultural operations, wastewater treatment facilities, and landfills, are controlled by city and county odor policies and health and safety codes requiring property owners to contain offensive odors, enforced by the air pollution control districts (APCDs), which prohibit nuisance odors and identify enforcement measures to reduce odor impacts to nearby receptors. The Plan would not expose a substantial number of people to objectionable odors. Odors from construction are temporary and intermittent in nature. While odors would need to be evaluated on a project-by-project basis, there is a potential for multiple projects to occur simultaneously within the same neighborhood and in close proximity of each other. However, because all projects must comply with odor regulations as prescribed by the applicable air district, the Plan would result in a less than significant impact to exposing a substantial number of people to objectionable odors.

⁵ California Air Resources Board. 9 January 2015. Area designations (activities and maps). Available at: <http://www.arb.ca.gov/desig/changes.htm#summaries>

4.2 ENERGY

Impact ENR-1 **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.**

Impact:

Less than significant

Finding:

The Plan would result in less than significant impacts. Therefore, no mitigation is required.

Rationale:

The above finding is made based on the analysis included in Section 3.6, Energy, of the PEIR. The transportation projects combined with transportation and land use strategies will encourage compact (more efficient) land use and more efficient, less energy intensive transportation (transit, bike, walk) which will result in a lower VMT per capita. The Plan would result in a reduction of per capita VMT, combined with federal and state policies that require reductions in fossil fuel consumption (see S-06-06 and EO B-48-18), and increased renewable energy use and availability (see EO B-18-12), and increased building efficiency (EO 13834). Therefore, the Plan would not result in wasteful or inefficient use of energy and impacts are less than significant.

Impact ENR-2 **Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.**

Impact:

Less than significant

Finding:

The Plan would result in less than significant impacts. Therefore, no mitigation is required.

Rationale:

The above finding is made based on the analysis included in Section 3.6, Energy, of the PEIR. The Plan would not result in the inefficient, wasteful, or unnecessary consumption of energy if it is consistent with

existing relevant energy conservation policies. Accordingly, inconsistencies between the Plan and adopted plans and policies related to energy conservation have not been identified. Specifically, development under the Plan would be required to be consistent with applicable regulations and policies including the LA County Sustainability Plan, the LA Green New Deal, as well as the Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura County General Plans. These plans encourage the use of renewable energy, energy conservation and energy efficiency techniques in all new building design, orientation and construction and support of alternative transportation and fuels. Implementation of the Plan is generally consistent with applicable policies regarding energy conservation and renewable energy. Therefore, impacts would be less than significant.

4.3 GEOLOGY AND SOILS

Impact GEO-1 **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides.**

Impact:

Less than significant

Finding:

The Plan would result in less than significant impacts. Therefore, no mitigation is required.

Rationale:

The above finding is based on the analysis included in Section 3.7, Geology and Soils, of the PEIR. 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, and therefore, the potential impacts of the Plan with regard to fault rupture are less than significant.

Impact GEO-3 **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.**

Impact:

Less than significant

Finding:

The Plan would result in less than significant impacts. Therefore, no mitigation is required.

Rationale:

The above finding is based on the analysis included in Section 3.7, Geology and Soils, of the PEIR. 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 California Building Code (CBC), transportation projects and anticipated development projects would be designed to minimize potential risks related to unstable soils and geologic units. Therefore, the potential for landslide, lateral spreading, subsidence, liquefaction, or other collapse impacts related to the implementation of transportation projects and anticipated development projects under the Plan, is considered less than significant.

Impact GEO-4 **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.**

Impact:

Less than significant

Finding:

The Plan would result in less than significant impacts. Therefore, no mitigation is required.

Rationale:

The above finding is based on the analysis included in Section 3.7, Geology and Soils, of the PEIR. Transportation projects and anticipated development under the Plan would not be expected to exacerbate existing conditions with respect to expansive soils. Expansive soil conditions would be addressed through

the integration of geotechnical information in the design process for development projects to determine whether a site is suitable for a project. Industry practice and state-provided guidance would minimize risk associated with geologic hazards. Compliance with CBC requirements as well as adherence to local building codes and ordinances would reduce hazards relating to expansive soils, and as such, impacts remain less than significant.

Impact GEO-5 **Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.**

Impact:

Less than significant

Finding:

The Plan would result in less than significant impacts. Therefore, no mitigation is required.

Rationale:

The above finding is based on the analysis included in Section 3.7, Geology and Soils, of the PEIR. The California State Water Resources Control Board has specific guidelines and requirements with regard to soil suitability for septic tanks and alternative waste water disposal systems in their publication 3.2C- Construction Practices – Onsite Wastewater Treatment Systems (OWTS). Soils with poorly or excessively drained soils are generally not suitable for septic tanks or alternatives waste water disposal systems. The Plan includes transportation investments and regional land use strategies that aim to produce more compact development in well-served transit areas. These land use strategies encourage compact development in HQTAs, existing suburban town centers, and more walkable, mixed-use communities to accommodate anticipated population growth. The Plan does not encourage or anticipate residential development in areas where sewers are not available for the disposal of waste water or where densities would not support the provision of sewer infrastructure. Therefore, impacts would be less than significant.

4.4 TRANSPORTION, TRAFFIC, AND SAFETY

Impact TRA-1 **Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.**

Impact:

Less than significant

Finding:

The Plan would result in less than significant impacts. Therefore, no mitigation is required.

Rationale:

The Plan calls for a substantial expansion of transit facilities and service to attract trips to transit and away from single-occupancy vehicle travel. Transit-oriented land use strategies would increase the frequency and quality of fixed-route bus service by adding new rapid service, express service, and community circulators for short trips.

The proposed Active Transportation plan would increase the mode share of transit and active transportation in the SCAG region. It is unlikely that conflicts with plans and policies addressing the circulation system would occur. At the transit agency level, SCAG incorporates local transit plans into the RTP through regular amendments to the Plan. With regard to bicycle and pedestrian plans, as described above, SCAG has done extensive outreach and coordination across numerous groups to capture local input. Further, SCAG regularly assists local jurisdiction in planning for these types of projects through grant funding. The Plan includes land use strategies to focus development in HQTAs and High Quality Transit Corridors (HQTCs). The strategies of the SCS that focus development in these transit rich areas allow transit and land use to work together. Therefore, impacts would be less than significant.

Impact TRA-3 Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact:

Less than significant

Finding:

The Plan would result in less than significant impacts. Therefore, no mitigation is required.

Rationale:

The above finding is made based on the analysis included in Section 3.17, Transportation, Traffic, and Safety, of the PEIR. Based on average accident rates provided by Caltrans, transportation-related fatalities

4.0 Findings Regarding Potential Environmental Effects that are Less than Significant

occur at an overall rate of 1.01 fatalities per 100 million vehicle miles traveled, considering the varying accident rates on different facility types (freeway, arterials) and travel modes (bus transit, rail transit). The two counties with the highest vehicle miles travelled, Los Angeles and Orange, have the lowest rates of fatalities per 100 million VMT, while the county with the lowest annual VMT, Imperial County, has the highest rate of fatalities per 100 million VMT. In 2016, in the SCAG region, more than 1,700 people died including more than 70 cyclists and nearly 500 pedestrians.

Based on the analysis included in Section 3.17, Transportation, Traffic, and Safety, of the PEIR, the Plan includes strategies to improve safety. The Plan includes strategies to encourage a complete streets approach to roadway improvements which would include design of facilities to enhance the safety of riders, bicyclists, and pedestrians and minimize hazards. These enhancements would also reduce hazards for drivers. The Plan includes 392 safety projects, comprising approximately 19 percent of the total budget. Therefore, impact would be less than significant.

5.0 FINDINGS REGARDING POTENTIAL ENVIRONMENTAL EFFECTS THAT CAN BE MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

SCAG finds that none of the potential environmental effects of Connect SoCal can be mitigated to a level of less than significant.

6.0 FINDINGS REGARDING SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS THAT CANNOT BE MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

As analyzed in the PEIR, SCAG has determined that the Plan has the potential to result in significant and unavoidable impacts in relation to the following environmental resource categories:

- 3.1 Aesthetics (AES-1, -2, -3, and -4)
- 3.2 Agriculture and Forestry Resources (AG-1, -2, -3, -4, and -5)
- 3.3 Air Quality (AQ-2, -3, and -4)
- 3.4 Biological Resources (BIO-1, -2, -3, -4, -5, and -6)
- 3.5 Cultural Resources (CULT-1, -2, -3)
- 3.7 Geology and Soils (GEO-2 and -6)
- 3.8 Greenhouse Gas Emissions and Climate Change (GHG-1 and -2)
- 3.9 Hazards and Hazardous Materials (HAZ-1, -2, -3, -4, -5, -6, and -7)
- 3.10 Hydrology and Water Quality (HYD-1, -2, -3 -4, and -5)
- 3.11 Land Use and Planning (LU-1 and -2)
- 3.12 Mineral Resources (MIN-1 and -2)
- 3.13 Noise (NOISE-1, -2, and -3)
- 3.14 Population, Housing, and Employment (POP-1 and -2)
- 3.15 Public Services (PSF-1, PSP-1, PSS-1, and PSL-1)
- 3.16 Parks and Recreation (REC-1 and -2)
- 3.17 Transportation, Traffic, and Safety (TRA-2 and -4)
- 3.18 Tribal Cultural Resources (TCR-1)
- 3.19 Utilities and Service Systems (USSW-1 and -2; USWW-1 and -2 and; USWS-1 and -2)
- 3.20 Wildfire (WF-1 and -2)

For each of these impacts, SCAG has identified program-level mitigation measures which are the responsibility of SCAG, as well as project-level mitigation measures which are the responsibility of local agencies. While SCAG has no authority to impose mitigation measures on local agencies and project sponsors, mitigation measures will be required by lead agencies at the project level if they identify potential impacts in the resource areas. To reduce impacts of the Plan, SCAG has identified project-level mitigation measures and finds that lead agencies can and should be consider these measures or other comparable measures to reduce potential impacts, as applicable and feasible. While the mitigation measures will reduce impacts of the Plan, they will not reduce the impacts to the level of less than significant.

6.1 AESTHETICS

Impact AES-1 Potential to have a substantial adverse effect on a scenic vista.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM-AES-1** and Project-Level Mitigation Measure **PMM-AES-1** will reduce adverse effects on scenic vistas to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.1, Aesthetics, of the PEIR. Implementation of Mitigation Measures **SMM-AES-1** and **PMM-AES-1** would reduce potential impacts to scenic resources and vistas. However, even with the implementation of these mitigation measures, the impacts would remain significant and unavoidable.

The SCAG Regional Council finds that due to the large number of transportation projects encompassed by the Plan, it is expected that new and expanded highway and roadway facilities, new and expanded transit projects, and new and expanded goods movement projects, or other facilities would result in significant impacts to scenic vistas in the region. Mitigation Measure **SMM AES-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-AES-1** would reduce adverse effects on scenic vistas to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in visual impacts, it is uncertain that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

SMM AES-1: SCAG shall facilitate minimizing impacts to scenic vistas through cooperation, information sharing regarding the locations of designated scenic vistas, and regional program development as part of SCAG’s ongoing regional planning efforts, such as web-based planning tools for local government including REVISION, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts such as sharing of associated online training materials.

**6.0 Findings Regarding Significant Unavoidable
Adverse Impacts that Cannot be Mitigated
to a Level of Less than Significant**

Caltrans and lead agencies, such as county and city planning departments, shall be consulted during this update process.

Project-Level Mitigation Measures

PMM AES-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 address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.
- b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.
- c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.
- d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.
- e) Retain or replace trees bordering highways, so that clear-cutting is not evident.
- f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.
- g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity;
- h) Use see-through safety barrier designs (e.g. railings rather than walls)

*6.0 Findings Regarding Significant Unavoidable
Adverse Impacts that Cannot be Mitigated
to a Level of Less than Significant*

Impact AES-2 **Potential to substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.**

Impact:

Significant and Unavoidable.

Finding:

Implementation of Mitigation Measures **SMM-AES-1** and **PMM-AES-1** will reduce impacts related to the potential to substantially damage scenic resources, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.1, Aesthetics, of the PEIR. Implementation of Mitigation Measures **SMM-AES-1** and **PMM-AES-1** would reduce impacts related to adverse effects on scenic resources. However, even with the implementation of these mitigation measures, the impacts would remain significant and unavoidable.

The SCAG Regional Council finds many of the transportation projects and the HQTAs are in areas with designated scenic resources including historic buildings and scenic rock outcroppings, and therefore, there is potential for the Plan to affect these resources. Mitigation Measure **SMM AES-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Mitigation Measure **PMM-AES-1** would reduce damage to scenic resources to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts on scenic resources it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See **SMM AES-1**.

Project Level Mitigation Measures

See PMM AES-1

Impact AES-3 **Potential to substantially degrade the existing visual character or quality of public views (public views are those that are experienced from publicly accessible vantage points). In an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.**

Impact:

Significant and Unavoidable.

Finding:

Implementation of Mitigation Measures **SMM AES-1, PMM-AES-1** and **PMM AES-2** will reduce impacts related to the potential to substantially degrade the visual character or quality of the SCAG region, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.1, Aesthetics, of the PEIR. Implementation of Mitigation Measures **SMM-AES-1, PMM-AES-1,** and **PMM AES-2** would reduce impacts related to adverse effects on visual character and quality. However, even with the implementation of these mitigation measures, the impacts would remain significant and unavoidable.

The SCAG Regional Council finds that the transportation projects and strategies, and the land use strategies in the Plan have the potential to result in changes to the visual character of existing landscapes or natural areas. Mitigation Measure **SMM AES-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Mitigation Measures **PMM-AES-1** and **PMM AES-2** would reduce the degradation of the existing visual character or quality of project sites to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts on the visual quality and character of sites, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, impacts remain significant and unavoidable. The SCAG Regional Council

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finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See SMM AES-1.

Project-Level Mitigation Measures

PMM AES-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 address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.
- b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.
- c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.
- d) Design projects consistent with design guidelines of applicable general plans.
- e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.
- f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows:

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- use transparent panels to preserve views where sound walls would block views from residences;
 - use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height;
 - construct sound walls of materials whose color and texture complements the surrounding landscape and development;
- g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.

Impact AES-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM AES-2** and Mitigation Measure **PMM AES-3** will reduce impacts related to the potential to create new sources of light and glare in the SCAG region, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.1, Aesthetics, of the PEIR. Implementation of Mitigation Measures **SMM AES-2** and **PMM AES-3** would reduce the potential for light and glare impacts. However, even with the implementation of these mitigation measures, the impacts would remain significant and unavoidable.

The SCAG Regional Council finds that many of the transportation projects, HQTAs and development as a result of transportation and land use strategies would have the potential create a new source of substantial light and glare that could adversely affect day or nighttime views in the areas, and therefore, there is a potential for the Plan to affect these resources. Mitigation Measure **SMM AES-2** would reduce project

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impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Mitigation Measure **PMM AES-3** would reduce the adverse effects of new sources of light and glare to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in the adverse effects of new sources of light and glare, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

SMM AES-2: SCAG shall facilitate minimizing impacts on aesthetics related to new sources of light or glare through cooperation, information sharing regarding guidelines and policies, design approaches, building materials, siting, and technology, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts and sharing of associated online training materials. Lead agencies, such as county and city planning departments, shall be consulted during this update process.

Project-Level Mitigation Measures

PMM AES-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 address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.
- b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances.
- c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.

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- d) Use unidirectional lighting to avoid light trespass onto adjacent properties.
- e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses.
- f) Provide structural and/or vegetative screening from light-sensitive uses.
- g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.
- h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
- i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.

6.2 AGRICULTURE AND FORESTRY RESOURCES

Impact AG-1 **Potential for the Plan to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.**

Impact:

Significant and Unavoidable

Finding:

Implementation of Mitigation Measures **SMM AG-1, SMM AG-2, SMM AG-3, and PMM-AG-1** will reduce impacts related to the potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), to non-agricultural use, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.2, Agriculture and Forestry Resources, of the PEIR. The loss and disturbance of agricultural lands would be significant. Implementation of Mitigation Measures **SMM AG-1, SMM AG-2, SMM AG-3, and PMM-AG-1** would reduce impacts related to disturbance and/or loss of prime farmlands and/or grazing lands; however, impacts would remain significant and unavoidable.

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The SCAG Regional Council finds that many of the transportation projects and development as a result of implementation of land use strategies are in areas with prime farmland, unique farmland or farmland of statewide importance, and therefore, there is potential for the Plan to affect these resources. Mitigation Measure **SMM AG-1**, **SMM AG-2** and **SMM AG-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Mitigation Measure **PMM AG-1** would reduce adverse effects on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

- SMM AG-1:** SCAG shall host a Natural & Farm Lands Conservation Working Group which will provide a forum for stakeholders to share best practices and develop recommendations for natural and agricultural land conservation throughout the region, including the development of a Natural Lands Conservation Strategy for the Connect SoCal Plan.
- SMM AG-2:** SCAG shall expand on the Natural Resource Inventory Database and Conservation Framework & Assessment by incorporating strategic mapping layers to build the database and further refine the priority conservation areas by (1) further investing in mapping and farmland data tracking and (2) working with County Transportation Commissions (CTCs) and SCAG's subregions to support their county-level efforts at data building. SCAG shall encourage CTCs to develop advanced mitigation programs or include them in future transportation measures by (1) funding pilot programs that encourage advance mitigation including data and replicable processes, (2) participating in state-level efforts that would support regional advanced mitigation planning in the SCAG region, and (3) supporting the inclusion of advance mitigation programs at county level transportation measures.
- SMM AG-3:** SCAG shall align with funding opportunities and pilot programs to begin implementation of conservation strategies through (1) seeking planning and implementation funds, such

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as cap and trade auction proceeds that could advance local action on acquisition and restoration projects locally and regionally, (2) supporting CTCs and other partners, and (3) continuing policy alignment with the State Wildlife Action Plan 2015 Update and its implementation.

SMM AG-4: SCAG shall provide incentives to jurisdictions that cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries, as detailed in the Natural & Farm Lands Appendix strategies of Connect SoCal. SCAG will work with stakeholders to identify incentives and leverage resources that help protect habitat corridors.

Project-Level Mitigation Measures

PMM AG-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 address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential.
- b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.
- c) Maintain and expand agricultural land protections such as urban growth boundaries.
- d) Provide for mitigation fees to support a mitigation bank⁶ that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.

⁶ The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website (please see <https://www.wildlife.ca.gov/Conservation/Planning/Banking>).

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- e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.
- f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.

Impact AG-2 Potential to conflict with existing zoning for agricultural use, or a Williamson Act contract.

Impact:

Significant and Unavoidable

Finding:

Implementation of Mitigation Measures **SMM AG-1, SMM AG-2, SMM AG-3, PMM-AG-1, and PMM AG-2** will reduce impacts related to the potential to conflict with existing zoning for agricultural use, or a Williamson Act contract, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.2, Agriculture and Forestry Resources, of the PEIR. Conflicts with existing zoning for agricultural use or a Williamson Act contract would be significant. Implementation of Mitigation Measures **SMM AG-1, SMM AG-2, SMM AG-3, PMM-AG-1, and PMM AG-2** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that many of the transportation projects and development as a result of implementation of land use strategies are in or nearby areas with existing zoning for agricultural use, or Williamson act contracts, and therefore there is potential for the Plan to affect these resources. Mitigation Measure **SMM AG-1, SMM AG-2, SMM AG-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Mitigation Measure **PMM AG-2** would reduce conflict with existing zoning for agricultural use, or a Williamson Act contract, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts on conflicts with existing zoning for agricultural use, or a Williamson Act contract, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

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Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See **SMM AG-1** through **SMM AG-4**.

Project-Level Mitigation Measures

See **PMM AG-1**.

PMM AG-2: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

- a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts.
- b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.

Impact AG-3 **Potential for the Plan to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).**

Impact:

Significant and Unavoidable

Finding:

Implementation of Mitigation Measures **SMM AG-1, SMM AG-2, and PMM AG-3** will reduce impacts related to the potential to conflict with existing zoning for forest land or timber land, to the maximum

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extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.2, Agriculture and Forestry Resources, of the PEIR. Conflicts with existing zoning for forest land or timber land would be significant. Implementation of Mitigation Measures **SMM AG-1, SMM AG-2, and PMM AG-3** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that many of the transportation projects, or development as a result of implementation of transportation and land use strategies, are in or nearby areas with forest lands and timberlands, and therefore, there is potential for the Plan to affect these resources. Mitigation Measure **SMM AG-1** and **SMM AG-2** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Mitigation Measure **PMM AG-3** would reduce conflict with existing zoning for forest land or timber land, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts on conflicts with existing zoning for forest land or timber land, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

Mitigation Measures

SCAG Mitigation Measures

See **SMM AG-1** through **SMM AG-2**.

Project Level Mitigation Measures

PMM AG-3: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

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- a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.

Impact AG-4 Potential for the Plan to result in the loss of forest land or conversion of forest land to non-forest use.

Impact:

Significant and Unavoidable

Finding:

Implementation of Mitigation Measures **SMM AG-1**, **SMM AG-2**, and **PMM AG-3** will reduce impacts related to the potential to result in the loss of forest land or conversion of forest land to non-forest use, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.2, Agriculture and Forestry Resources, of the PEIR. Conversion of forest land to non-forest use would be significant. Implementation of Mitigation Measures **SMM AG-1**, **SMM AG-2**, and **PMM AG-3** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that many of the transportation projects or development as a result of implementation of transportation and land use strategies are in or nearby areas with forest lands which maybe result in conversion to non-forest uses, and therefore, there is potential for the Plan to affect these resources. Mitigation Measure **SMM AG-1** and **SMM AG-2** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Mitigation Measures **PMM AG-1**, **PMM AG-2**, and **PMM AG-3** would reduce the potential to result in the loss of forest land or conversion of forest land to non-forest use, to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation provided may reduce the potential to result in the loss of forest land or conversion of forest land to non-forest use, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

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Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

Mitigation Measures

SCAG Mitigation Measures

See SMM AG-1 through SMM AG-2.

Project Level Mitigation Measures

See PMM AG-3.

Impact AG-5 **Potential for the Plan to involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.**

Impact:

Significant and Unavoidable

Finding:

Implementation of Mitigation Measures **SMM AG-1** through **SMM AG-2**; **SMM-GHG-1** through **SMM-GHG-5**; **PMM AG-2**, **PMM AG-3**, and **PMM GHG-2** will reduce impacts related to the potential to involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.2, Agriculture and Forestry Resources, of the PEIR. The conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use as a result of other changes in the environment would be significant. Implementation of Mitigation Measures **SMM AG-1** through **SMM AG-2**; **SMM-GHG-1** through **SMM-GHG-5**; **PMM AG-**

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2, PMM AG-3, and PMM GHG-2 would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that many of the transportation projects or development as a result of implementation of transportation and land use strategies are in or nearby areas with agricultural land and forest lands, and therefore, there is potential for the Plan to affect these resources. Mitigation Measure SMM AG-1, SMM AG-2, SMM GHG-1 through SMM GHG-5 would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Mitigation Measures PMM AG-2 through PMM AG-3 and PMM GHG-2 would reduce the potential to result in the loss of forest land or conversion of forest land to non-forest use to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation provided may reduce the potential to result in the loss of forest land or conversion of forest land to non-forest use, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See SMM AG-1 through SMM AG-2 and SMM-GHG-1 through SMM-GHG-5.

Project-Level Mitigation Measures

See PMM AG-2 through PMM AG-3 and PMM GHG-2.

PMM AG-4: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

- a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.
- b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-

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project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.

- c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.

PMM AG-5: Project-level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

- a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.

6.3 AIR QUALITY

Impact AQ-2 **Potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation.**

Impact:

Significant and Unavoidable

Finding:

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Implementation of SCAG Mitigation Measure **SMM-AQ-1 through SMM-AQ-3** and Project-Level Mitigation Measure **PMM-AQ-1** will reduce impacts related to the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.3, Air Quality, of the PEIR. The potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation would be significant. Implementation of Mitigation Measures **SMM AQ-1 through SMM-AQ-3** and **PMM-AQ-1** would reduce these impacts; however, impacts would remain significant and unavoidable.

The construction and operation of individual transportation projects and anticipated development as result of implementation of the proposed transportation and land use strategies in the Plan are expected to have the potential to violate air quality standards or contribute substantially to an air quality violation.

The SCAG Regional Council finds that the Plan, when compared to existing conditions, would result in an increase to on-road mobile-source PM_{2.5} in Imperial, Riverside, and San Bernardino Counties and an increase in mobile-source emissions related to PM₁₀ would increase in Imperial, Orange, Riverside, and San Bernardino Counties due to increasing traffic. Therefore, there is potential for the Plan to violate air quality standards or contribute substantially to an existing or projected air quality violation. Mitigation Measure **SMM AQ-1 through SMM AQ-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-AQ-1** would reduce the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in air quality impacts, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impacts to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

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- 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.

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.

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- 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 for a CARB-approved fleet.
- k) Ensure that all construction equipment is properly tuned and maintained.
- l) Minimize idling time to 5 minutes—saves fuel and reduces emissions.
- m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
- o) Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts.

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- p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.

- q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to 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 make 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. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible.

- r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which 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.

- s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.

- t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.

- u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).

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- v) As applicable for airport projects, the following measures should be considered:
 - a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxiing, if feasible as allowed per Federal Aviation Administration guidelines.
 - b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project.
 - c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum.

- w. As applicable for port projects, the following measures should be considered:
 - a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE).
 - b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.
 - c. Use short 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.
 - d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized.
 - e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.
 - f. Encourage the participation in the Green Ship Incentives.
 - g. Offer incentives to encourage the use of on-dock rail.

- x. As applicable for rail projects, the following measures should be considered:

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- a. 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.

- y. Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

- z. Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.
 - 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 or residents are outside.
 - 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. Disclose the potential increase in energy costs for running the HVAC system to prospective residents.
 - d. Provide information to residents on where MERV filters can be purchased.
 - e. Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units.
 - f. Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.
 - g. Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.
 - h. Set criteria for assessing progress in installing and replacing the enhanced filtration units; and

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- i. Develop a process for evaluating the effectiveness of the enhanced filtration units.
- aa. Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.

Impact AQ-3 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM AQ-1**, **SMM AQ-2**, and **SMM AQ-3** and Project-Level Mitigation Measure **PMM AQ-1** will reduce impacts related to criteria pollutants to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.3, Air Quality, of the PEIR. The potential for a project to cause a cumulatively considerable increase of criteria pollutants in a non-attainment region would be significant. Implementation of Mitigation Measures **SMM AQ-1**, **SMM AQ-2**, and **SMM AQ-3** would reduce these impacts; however, impacts would remain significant and unavoidable.

The construction and operation of individual transportation projects and anticipated development as result of implementation of the proposed transportation and land use strategies in the Plan are expected to cause a cumulatively considerable increase of criteria pollutants in a non-attainment region.

The SCAG Regional Council finds that implementation of the Plan would result in an increase to emissions in some counties (See AQ-2), and the Plan could contribute to cumulative impacts from adjacent MPO's. Therefore, there is potential for the Plan to cause a cumulatively considerable increase of criteria pollutants in a non-attainment region. Mitigation Measure **SMM AQ-1**, **SMM AQ-2** and **SMM AQ-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-AQ-1** would reduce the

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potential to violate any air quality standard or contribute substantially to pollutant concentrations and the related harm to public health, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction related to the cumulatively considerable increase of criteria pollutants in a non-attainment region, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See SMM AQ-1, SMM AQ-2, and SMM AQ-3.

Project-Level Mitigation Measures

See PMM-AQ-1.

Impact AQ-4 Expose sensitive receptors to substantial pollutant concentrations.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures SMM AQ-1, SMM AQ-2, and SMM AQ-3 and Project-Level Mitigation Measure PMM-AQ-1 will reduce impacts related to the exposure of sensitive receptors to substantial pollutant concentrations and the related harm to public health, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.3, Air Quality, of the PEIR. The potential to expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially would be significant. Implementation of Mitigation Measures SMM AQ-1, SMM

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AQ-2, and SMM AQ-3 would reduce these impacts; however, impacts would remain significant and unavoidable.

The construction and operation of individual transportation projects and anticipated development as result of implementation of the proposed transportation and land use strategies in the Plan are expected to expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially.

The SCAG Regional Council finds that construction activity would occur adjacent to sensitive receptors. The significant construction emissions identified in AQ-2, could result in an adverse health effects to sensitive receptors. The Regional Council further finds that extended 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. Mitigation Measure SMM AQ-1 through SMM AQ-3 would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure PMM-AQ-1 would reduce the potential to violate any air quality standard or contribute substantially to pollutant concentrations and the related harm to public health, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction related to the exposure of sensitive receptors to substantial pollutant concentrations and the related harm to public health, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See SMM AQ-1, SMM AQ-2, and SMM AQ-3.

Project-Level Mitigation Measures

See PMM-AQ-1.

6.4 BIOLOGICAL RESOURCES

Impact BIO-1 **Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special**

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**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:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM BIO-1 and SMM BIO-2** and Project-Level Mitigation Measure **PMM BIO-1** will reduce impacts related to the potential to have a substantial adverse effect 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, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.4, Biological Resources, of the PEIR. The potential to 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 Game or U.S. Fish and Wildlife Service would be significant. Implementation of Mitigation Measures **SMM BIO-1 and SMM BIO-2** and **PMM BIO-1** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that the implementation of transportation projects and development projects anticipated to occur under the Plan would affect biological resources. Impacts may occur through direct habitat loss and fragmentation during construction, displacement of sensitive species due to construction noise or during operation, accidental introduction of non-native plants by construction equipment or during maintenance and general operation, introduction of new lighting sources, and dust and noise during construction and operation. Impacts could result from general development related to growth that is expected to occur with the Plan. Impacts could also occur as a result of transportation projects if suitable habitat was encroached upon to the extent that it could no longer support sensitive species. Indirect impacts may include edge effects resulting from habitat fragmentation which can alter habitat structure and composition as well as negatively impact predator-prey dynamics. Therefore, there is potential for the Plan to have a substantial adverse effect, 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. Mitigation Measure **SMM BIO-1 and BIO-2** would

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reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM BIO-1** would reduce adverse effects 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, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts to biological resources, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

SMM BIO-1: SCAG shall facilitate reducing future impacts to species identified as a candidate, sensitive, or special status species and its habitats through cooperation, information sharing, and program development. SCAG shall consult with the resource agencies, such as the USFWS, NMFS, USACE, USFS, BLM, and CDFW, as well as local jurisdictions including cities and counties, to incorporate designated critical habitat, federally protected wetlands, the protection of sensitive natural communities and riparian habitats, designated open space or protected wildlife habitat, local policies and tree preservation ordinances, applicable HCPs and NCCPs, or other related planning documents into SCAG's ongoing regional planning efforts, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts and sharing of associated online Training materials. Planning efforts shall be consistent with the approach outlined in the California Wildlife Action Plan.

SMM BIO-2: SCAG shall continue to develop a regional conservation strategy in coordination with local jurisdictions and other stakeholders, including the county transportation commissions. The conservation strategy will build upon existing efforts including those at the sub-regional and local levels to identify potential priority conservation areas. SCAG shall develop new regional tools, like the Regional Data Platform and Regional Greenprint to help local jurisdictions identify areas well suited for infill and redevelopment as well as critical habitat and natural lands to be preserved, including natural habitat corridors.

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SCAG will also collaborate with stakeholders to establish a new Regional Advanced Mitigation Program (RAMP) initiative to preserve habitat. The RAMP will be supplemental initiative to regional conservation and mitigation banks and other approaches by evaluating, advocating and highlighting projects that support per capita VMT reduction.

Project-Level Mitigation Measures

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. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.

- b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include:
 - i. Impact minimization strategies
 - ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts
 - iii. Use of in-kind mitigation bank credits
 - iv. Funding of research and recovery efforts
 - v. Habitat restoration
 - vi. Establishment of conservation easements
 - vii. Permanent dedication of in-kind habitat

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- c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.
- d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species
- e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.
- f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.
- g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.
- h) Appoint a qualified biologist to monitor implementation of mitigation measures.
- i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.
- j) Develop an invasive species control plan associated with project construction
- k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife
- l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.
- m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.

Impact BIO-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM BIO-1** and **SMM BIO-2** and Project-Level Mitigation Measures **PMM BIO-1** and **PMM BIO-2** will reduce impacts related to the potential to 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, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.4, Biological Resources, of the PEIR. The potential to 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 would be significant. Implementation of Mitigation Measures **SMM BIO-1**, **SMM BIO-2**, **PMM BIO-1**, and **PMM BIO-2** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that the implementation of Plan projects that have the potential to cross waterways or require conversion of natural open space to infrastructure, such as transit or rail projects, highway segment projects, or land use development in open space areas located near state-designated habitats including riparian habitats, could potentially result in 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. Mitigation Measure **SMM BIO-1** and **SMM BIO-2** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM BIO-1** and **PMM BIO-2** would reduce adverse effects 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, to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as

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required by CEQA. While mitigation may provide a reduction in impacts to biological resources, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See **SMM BIO-1** and **SMM BIO-2**.

Project-Level Mitigation Measures

See **PMM BIO-1**.

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. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA.
- b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.
- c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.

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- d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.
- e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.
- f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities.
- g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible.
- h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.
- i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.
- j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures.
- k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.
- l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.
- m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan.

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- n) Install fencing and/or mark sensitive habitat to be avoided during construction activities.
- o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist.
- p) Revegetate with appropriate native vegetation following the completion of construction activities. as identified by the qualified wetland biologist.
- q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).
- r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.

Impact BIO-3 **Have a substantial adverse effect on State or Federally Protected Wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM BIO-1 and SMM BIO-2** and Project-Level Mitigation Measures **PMM BIO-1, PMM BIO-2, and PMM BIO-3** will reduce impacts related to the potential to have a substantial adverse effect on State or Federally Protected Wetlands, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

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The above finding is made based on the analysis included in Section 3.4, Biological Resources, of the PEIR. The potential to have a substantial adverse effect on State or Federally Protected Wetlands would be significant. Implementation of Mitigation Measures **SMM BIO-1, SMM BIO-2, PMM BIO-1, PMM BIO-2, and PMM BIO-3** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that the transportation projects and development as a result of implementation of the Plan's transportation or land use strategies could impact wetlands. For example, grade separation projects or transit/rail projects located in areas could impact coastal habitats or areas close to the terminal locations of major rivers or stream systems. While land use development projects may be focused in areas that are already developed as reflected under the Plan, some new projects are still anticipated in areas where wetlands are located. Therefore, the Plan could potentially have a substantial adverse effect, on State or Federally Protected Wetlands. Mitigation Measure SMM BIO-1 and SMM BIO-2 would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM BIO-1, PMM BIO-2, and PMM BIO-3** would reduce adverse effects on State or Federally Protected Wetlands, to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts to biological resources, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

Impact BIO-4 Interfere substantially with the movement of any 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.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM BIO-1 through SMM BIO-3, SMM AG-1 through SMM AG-4, SMM GHG-1, SMM WF-1** and Project-Level Mitigation Measures **PMM BIO-1 through**

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PMM BIO-4 will reduce impacts related to the potential to interfere substantially with the movement of any 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, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.4, Biological Resources, of the PEIR. The potential to interfere substantially with the movement of any 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 would be significant. Implementation of SCAG Mitigation Measures **SMM BIO-1** through **SMM BIO-3**, **SMM AG-1** through **SMM AG-4**, **SMM GHG-1**, **SMM WF-1** and Project-Level Mitigation Measures **PMM BIO-1** through **PMM BIO-4** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that projects listed in the Plan would involve large-scale ground disturbance during construction such as grade separation projects, mixed flow lane projects, and rail projects. Large-scale land use development could result in significant impacts to the wildlife movement corridors and native wildlife nursery sites. Indirect impacts to migratory corridors and nursery sites would occur when the functionality of a corridor is degraded after construction of the transportation project. Therefore, the Plan could potentially interfere with the movement of any 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. Mitigation Measure **SMM BIO-1** through **SMM BIO-3**, **SMM AG-1** through **SMM AG-4**, **SMM GHG-1**, and **SMM WF-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM BIO-1** through **PMM BIO-4** would reduce the potential to interfere substantially with the movement of any 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, to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts to biological resources, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional

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Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See **SMM BIO-1** and **SMM BIO-2**, **SMM AG-1** through **SMM AG-4**, **SMM GHG-1**, **SMM WF-1**.

SMM BIO-3: SCAG shall encourage and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.

Project-Level Mitigation Measures

See **PMM BIO-1** through **PMM BIO-3**.

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. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.
- b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans.
- c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.
- d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.

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- e) Prohibit construction activities within 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.
- f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.
- g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.
- h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site.
- i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor.
- j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.
- k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).
- l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.
- m) 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. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation.
- n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.
- o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general

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plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in **MM-BIO-1(b)**, where applicable:

- Wildlife movement buffer zones
 - Corridor realignment
 - Appropriately spaced breaks in center barriers
 - Stream rerouting
 - Culverts
 - Creation of artificial movement corridors such as freeway under- or overpasses
 - Other comparable measures
- p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.

Impact BIO-5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM BIO-1** through **SMM BIO-3** and Project-Level Mitigation Measures **PMM BIO-1** through **PMM BIO-5** will reduce impacts related to the potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.4, Biological Resources, of the PEIR. The potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance would be significant. Implementation of Mitigation Measures **SMM BIO-1** through **SMM BIO-3** and **PMM BIO-1** through **PMM BIO-5** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that impacts are expected to occur because many natural land areas near the edge of existing urbanized areas are vulnerable to development pressure, and projects aimed to improve accessibility might require expansion in existing urbanized areas or facilitate growth into urbanizing areas. Therefore, the Plan would potentially conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Mitigation Measure **SMM BIO-1** through **SMM BIO-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM BIO-1** through **PMM BIO-5** would mitigate the potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts to biological resources, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See **SMM BIO-1**, **SMM BIO-2** and **SMM BIO-3**.

Project-Level Mitigation Measures

See **PMM BIO-1** through **PMM BIO-4**.

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. Such

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measures may include the following or other comparable measures identified by the Lead Agency.

- a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.
- b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist.
- c) If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist.
- d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed.
- e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.
- f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored

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within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.

- g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.

- h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources

- i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:
 - Avoidance strategies
 - Contribution of in-lieu fees
 - Planting of replacement trees
 - Re-landscaping areas with native vegetation post-construction
 - Other comparable measures developed in consultation with local agency and certified arborist.

Impact BIO-6 **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM BIO-1** through **SMM BIO-3** and Project-Level Mitigation Measures **PMM BIO-1** through **PMM BIO-6** will reduce impacts related to the potential to conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.4, Biological Resources, of the PEIR. The potential to conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan would be significant. Implementation of Mitigation Measures **SMM BIO-1** through **SMM BIO-3** and **PMM BIO-1** through **PMM BIO-6** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that transportation and development projects may occur in or adjacent to lands protected under these plans. Therefore, the Plan could potentially conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Mitigation Measure **SMM BIO-1** through **SMM BIO-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM BIO-1** through **PMM BIO-6** would mitigate the potential to conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts to biological resources, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

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Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

6.5 CULTURAL RESOURCES

Impact 3.5-1 **Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM CULT-1** and Project-Level Mitigation Measure **PMM CULT-1** will reduce impacts related to the potential to cause a substantial adverse change in the significance of a historical resource, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.5, Cultural Resources, of the PEIR. The potential to cause a substantial adverse change in the significance of a historical resource would be significant. Implementation of Mitigation Measures **SMM CULT-1** and **PMM CULT-1** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that implementation of the Plan's transportation projects would have the potential to cause an impact to historical resources due to the development of new lanes, tracks, arterials, or interchanges that may require the acquisition of new right-of-ways, as well as development projects influenced by the land use strategies in the Plan. Such projects may result in direct demolition of historical resources or more indirect impacts such as changing the aesthetic context of the resource and/or increasing levels of corrosive air contaminants that affect historical features, and/or project construction activity that can result in vibrations that damage to fragile buildings. Construction of transportation projects and development projects anticipated to occur under the Plan could impact the physical and aesthetic integrity of historic buildings and communities. Therefore, the Plan could potentially cause a substantial adverse change in the significance of a historical resource. Mitigation Measure **SMM CULT-1**

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would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM CULT-1** would reduce adverse effects on unique historical resources, to the maximum extent feasible, because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts to historical resources, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SMM CULT-1: Impacts to cultural resources shall be minimized through cooperation, information sharing, and SCAG's ongoing regional planning efforts such as web-based planning tools for local governments including CA LOTS, and other GIS tools and data services, including, but not limiting to, Map Gallery, GIS library, and GIS applications; and direct technical assistance efforts such as Toolbox Tuesday series and sharing of associated online Training materials. SCAG shall consult with resource agencies such as the National Park Service, Office of Historic Preservation, and Native American Heritage Commission to identify opportunities for early and effective consultation to identify archaeological sites, historical resources, and cemeteries to avoid such resources wherever practicable and feasible and reduce or mitigate for conflicts in compatible land use to the maximum extent practicable.

Project-Level Mitigation Measures

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. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a. Pursuant to *CEQA Guidelines* Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified.
- b. During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional

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Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.

- c. Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:
 - Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior’s Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.
 - Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.
- d. If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior’s Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.
- e. If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic

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American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency.

- f. During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified.
- g. Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.
- h. During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the records indicate that no previous survey has been conducted, the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.
- i. If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities

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that occurred in this area. Archaeological materials collected from a significant resource should be curated with a recognized scientific or educational repository

- j. If a record search or archaeological assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, retain an archaeological monitor to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS
- k. Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.
- l. Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant. If the archaeologist determines that the discovery is significant, it should be curated with a recognized scientific or educational repository.

Impact 3.5-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM CULT-1** and Project-Level Mitigation Measure **PMM CULT-1** will reduce impacts related to the potential to change in the significance of an archaeological resource to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

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Rationale:

The above finding is made based on the analysis included in Section 3.5, Cultural Resources, of the PEIR. The potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 would be significant. Implementation of Mitigation Measures **SMM CULT-1** and **SMM CULT-2** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that construction of any new transportation facilities has the potential to impact archaeological resources by changing the context of the resource or directly through disturbing previously undisturbed resources. Activities to increase roadway capacity such as the construction of additional lanes would potentially impact archaeological resources, if it would entail grading, trenching, excavation, and/or soil removal in an area not previously disturbed. The Connect SoCal Plan also includes land use strategies that focus new growth in urbanized areas that are generally developed and therefore subject to varying levels of disturbance. Therefore, the Plan could potentially result in a change in the significance of an archaeological resource. Mitigation Measure **SMM CULT-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM CULT-2** would reduce adverse effects on archaeological resource to the maximum extent feasible, because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts on archaeological resources it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

See **SMM CULT-1**.

Project-Level Mitigation Measures

See PMM CULT-1.

Impact 3.5-3 **Disturb human remains, including those interred outside of dedicated cemeteries.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM CULT-1** and Project-Level Mitigation Measure **PMM CULT-2** will reduce impacts related to the potential to disturb human remains, including those interred outside of formal cemeteries to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.5, Cultural Resources, of the PEIR. The potential to disturb human remains, including those interred outside of formal cemeteries would be significant. Implementation of Mitigation Measures **SMM CULT-1** and **PMM CULT-2** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that transportation projects and anticipated growth under the Plan could take place in previously undisturbed or areas with only little previous disturbance, and excavation and soil removal of any kind. Therefore, the Plan could potentially disturb human remains, including those interred outside of formal cemeteries. Mitigation Measure **SMM CULT-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM CULT-2** would reduce adverse effects on potential to disturb human remains, including those interred outside of formal cemeteries to the maximum extent feasible, because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in potential to disturb human remains, including those interred outside of formal cemeteries, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional

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Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

See SMM CULT-1.

Project-Level Mitigation Measures

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. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a. In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.
- b. If any discovered remains are of Native American origin:
 - Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.
 - If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.

6.7 GEOLOGY AND SOILS

Impact GEO-2 Potential to result in substantial soil erosion or the loss of topsoil.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM-GEO-1** and Project-Level Mitigation Measure **PMM-GEO-1** will reduce impacts related to the potential to result in substantial soil erosion or the loss of topsoil, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.7, Geology and Soils, of the PEIR. The potential to result in substantial soil erosion or the loss of topsoil would be significant. Implementation of Mitigation Measures **SMM-GEO-1** and **PMM-GEO-1** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that the Plan contains transportation projects that would be located in areas prone to landslide, liquefaction and/or erosion. Additionally, land use strategies would have the potential to direct more growth into existing urban centers, walkable mixed-use communities, transit-oriented development, and other areas well-served by transit such as high-quality transit areas (HQTAs). Increased density could increase the number of people and structures exposed to potential fault rupture at a given location. Therefore, the Plan could potentially result in substantial soil erosion or the loss of topsoil. Mitigation Measure SMM GEO-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-GEO-1** would reduce impacts related to substantial soil erosion or the loss of topsoil, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to substantial soil erosion or the loss of topsoil, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional

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Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SMM-GEO-1: SCAG shall facilitate the minimization of substantial soil erosion or loss of topsoil through cooperation, information sharing, and regional program development as part of SCAG’s ongoing regional planning efforts. Such efforts shall include web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts such as training series and sharing of associated online training materials. Resource agencies, such as the U.S. Geology Survey, shall be consulted during this update process.

Project-Level Mitigation Measures

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. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.
- b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program.

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- c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.

- d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.

Impact GEO-6 **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM-GEO-3** and Project-Level Mitigation Measure **PMM-GEO-1** will reduce impacts related to the potential to directly or indirectly destroy unique paleontological resources or sites or unique geological features, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in **Section 3.7 Geology and Soils** of the PEIR. The potential to directly or indirectly destroy unique paleontological resources or sites or unique geological features would be significant. Implementation of Mitigation Measures **SMM-GEO-3** and **PMM-GEO-1** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that ground-disturbing activities associated with transportation projects and development projects would occur under the Plan. Therefore, the Plan could potentially result in substantial adverse effects on a unique paleontological resources or sites or unique geological features. Mitigation Measure SMM GEO-3 would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-**

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GEO-1 would reduce adverse effects on unique paleontological resources and sites or unique geological features, to the maximum extent feasible, because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts to unique paleontological resources or sites or unique geological features, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

SMM-GEO-3: Impacts to paleontological resources shall be minimized through cooperation, information sharing, and SCAG’s ongoing regional planning efforts such as web-based planning tools for local governments including CA LOTS, and other GIS tools and data services, including, but not limiting to, Map Gallery, GIS library, and GIS applications; and direct technical assistance efforts such as training series and sharing of associated online training materials. SCAG shall consult with resource agencies such as the National Park Service, United States Forest Service, and Bureau of Land Management to identify opportunities for early and effective consultation to identify unique paleontological resources and unique geological features to avoid such resources wherever practicable and feasible and reduce or mitigation for conflicts in compatible land use to the maximum extent practicable.

Project-Level Mitigation Measures

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. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate

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Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.

- b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.
- c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.
- d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:
 - 1) All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.
 - 2) A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.
 - 3) Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine

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if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.

- 4) Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas.
- e) Avoid routes and project designs that would permanently alter unique geological features.
- f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.
- g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.
- h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.

6.8 GREENHOUSE GASES

Impact GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Impact:

Significant and unavoidable

Finding:

The Plan would result in significant impacts with regard to directly or indirectly generating greenhouse gas emissions. Implementation of SCAG Mitigation Measures **SMM GHG-1** through **SMM GHG-4** and Project-Level Mitigation Measure **PMM-GHG-1** will reduce impacts related to GHG emissions to the

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maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.8, Greenhouse Gases, of the PEIR. The potential to generate greenhouse gas emissions either directly or indirectly would be significant. Implementation of Mitigation Measures **SMM GHG-1** through **SMM GHG-4** and **PMM-GHG-1** would reduce direct and indirect impacts with regard to GHGs; however, impacts would remain significant and unavoidable.

The Regional Council finds that direct emissions in the transportation sector derived from fuel combustion in vehicles (i.e., automobiles, trucks, trains, buses, planes, ships, and trains) and natural gas combustion from stationary sources would occur under the Plan. Additionally, the Plan would result in indirect sources of emissions, which include off-site emissions occurring as a result of electricity from stationary sources and off-site emissions occurring as a result of electricity, water consumption and solid waste. Therefore, the Plan would generate greenhouse gas emissions, either directly or indirectly to the environment. Mitigation Measure SMM GH-1 through SMM GHG-4 would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council finds that Project-Level Mitigation Measure **PMM-GHG-1** would reduce impacts related to the Plan's potential to generate GHGs, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to greenhouse gas emissions, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this cumulative impact remains significant and unavoidable. The SCAG Regional Council finds that the significant cumulative impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

SMM GHG-1: SCAG, in partnership with local air districts, shall continue to work with the counties and cities to adopt qualified GHG reduction plans (e.g., climate action plans [CAPs], develop GHG-reducing planning policies, and implement local climate initiatives. These reductions can be achieved through a combination of programs, that implement plans

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developed collaboratively, including ZNE in new construction, retrofits of existing buildings, incentivizing the development of renewable energy sources that serve both new and existing land uses, as well as measures to reduce GHG emissions from transportation sources.

SMM GHG-2: SCAG shall encourage energy efficient design for buildings, through SCAG's Sustainable Communities Program potentially including strengthening local building codes for new construction and renovation to achieve a higher level of energy efficiency.

SMM GHG-3: SCAG shall continue working with partners including universities, utilities, regulating agencies, the private sector and NGO's, and member agencies to support deployment of electric vehicle (EV) charging in the region. SCAG shall provide resources to member agencies and supply them with available information and data so that they can better take advantage of legislation and funding for EV charging.

SMM GHG-4: SCAG shall continue to pursue partnerships with SCE, municipal utilities, locally operated electricity providers and CPUC to promote energy efficient development in the SCAG region, through coordinated planning and data and information sharing activities.

Project-Level Mitigation Measures

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. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:
 - i) Use energy efficient materials in building design, construction, rehabilitation, and retrofit.
 - ii) Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.

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- iii) Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight.
 - iv) Incorporate passive environmental control systems that account for the characteristics of the natural environment.
 - v) Use high-efficiency lighting and cooking devices.
 - vi) Incorporate passive solar design.
 - vii) Use high-reflectivity building materials and multiple glazing.
 - viii) Prohibit gas-powered landscape maintenance equipment.
 - ix) Install electric vehicle charging stations.
 - x) Reduce wood burning stoves or fireplaces.
 - xi) Provide bike lanes accessibility and parking at residential developments.
- b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the *State CEQA Guidelines*.
- c) Include off-site measures to mitigate a project's emissions.
- d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:
- i) Use energy and fuel-efficient vehicles and equipment;
 - ii) Deployment of zero- and/or near zero emission technologies;
 - iii) Use lighting systems that are energy efficient, such as LED technology;
 - iv) Use the minimum feasible amount of GHG-emitting construction materials;
 - v) Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;

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- vi) Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
 - vii) Incorporate design measures to reduce energy consumption and increase use of renewable energy;
 - viii) Incorporate design measures to reduce water consumption;
 - ix) Use lighter-colored pavement where feasible;
 - x) Recycle construction debris to maximum extent feasible;
 - xi) Plant shade trees in or near construction projects where feasible; and
 - xii) Solicit bids that include concepts listed above.
- e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:
- i) Promote transit-active transportation coordinated strategies;
 - ii) Increase bicycle carrying capacity on transit and rail vehicles;
 - iii) Improve or increase access to transit;
 - iv) Increase access to common goods and services, such as groceries, schools, and day care;
 - v) Incorporate affordable housing into the project;
 - vi) Incorporate the neighborhood electric vehicle network;
 - vii) Orient the project toward transit, bicycle and pedestrian facilities;
 - viii) Improve pedestrian or bicycle networks, or transit service;
 - ix) Provide traffic calming measures;
 - x) Provide bicycle parking;

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- xi) Limit or eliminate park supply;
- xii) Unbundle parking costs;
- xiii) Provide parking cash-out programs;
- xiv) Implement or provide access to commute reduction program;
- f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;
- g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and
- h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:
 - i) Provide car-sharing, bike sharing, and ride-sharing programs;
 - ii) Provide transit passes;
 - iii) Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;
 - iv) Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle;
 - v) Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;
 - vi) Provide employee transportation coordinators at employment sites;
 - vii) Provide a guaranteed ride home service to users of non-auto modes.

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- i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;
- j) Land use siting and design measures that reduce GHG emissions, including:
 - i) Developing on infill and brownfields sites;
 - ii) Building compact and mixed-use developments near transit;
 - iii) Retaining on-site mature trees and vegetation, and planting new canopy trees;
 - iv) Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and
 - v) Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.
- k. Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.

Impact GHG-2 **Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.**

Impact:

Significant and unavoidable

Finding:

The Plan has demonstrated that it will meet and exceed CARB’s targets for greenhouse gas emissions from light duty passenger vehicles for 2020 and 2035, respectively. By meeting the SB 375 targets, the Plan has technically contributed its share (in the transportation sector), towards meeting the AB 32, SB 32, and the

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Scoping Plan targets. GHG impacts are generally cumulative in nature and have broader (i.e. statewide, national, and global) implications. Also, CARB has indicated 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. As recognized by CARB, MPO's do not have land use authority to implement additional VMT reductions. Furthermore, SCAG has no control or authority over the other key sectors (e.g., energy, industry, water, waste and agriculture) in meeting the AB 32, SB 32, and Scoping Plan targets. Assuming existing available emission factors, GHG emissions in the SCAG region are not on-track to achieve targets identified in AB 32, SB 32 and the Scoping Plan resulting in a significant and unavoidable impact. Mitigation is required.

Implementation of SCAG Mitigation Measures **SMM GHG-1** through **SMM GHG-4** and Project-Level Mitigation Measure **PMM-GHG-1** will reduce impacts related to the potential to conflict with AB 32 and or any applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.8, Greenhouse Gases, of the PEIR. With respect to impacts of the Plan, the potential to conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs would be significant. Implementation of Mitigation Measures **SMM GHG-1** through **SMM GHG-4** and **PMM-GHG-1** would reduce direct and indirect impacts; however, impacts would remain significant and unavoidable.

Although the SCAG Regional Council finds that the Plan itself is not in conflict with AB 32 or the State long-term GHG emissions reduction goals as set forth in the Executive Orders, the GHG and climate change impact analysis is limited in scope (transportation sector). Further, CARB has indicated 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.

Mitigation Measure **SMM GHG-1** through **SMM GHG-4** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-GHG-1** would reduce impacts related to conflicts with AB 32 and other applicable plans, policies, and regulations adopted for the purpose of reducing emissions of GHGs, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA While mitigation may provide a reduction in

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impacts related to greenhouse gas emissions, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this cumulative impact remains significant and unavoidable. The SCAG Regional Council finds that the significant cumulative impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See SMM GHG -1, SMM GHG-2, SMM GHG-3, and SMM GHG-4.

Project-Level Mitigation Measures

See PMM-GHG-1.

Level of Significance after Mitigation

As discussed above, regulations and policies would reduce impacts but given the regional scale of the analysis in this PEIR, it is not possible to determine if all impacts would be fully mitigated by existing regulations and policies. Therefore, this EIR identifies project-level mitigation measures consistent with applicable regulations and policies designed to reduce impacts. Lead Agencies may choose to include project-level mitigation measures in environmental documents as they determine to be appropriate and feasible. However, because of the regional nature of the analysis, the estimated GHG emissions from the three primary sources, the difficulty in quantifying both future emission and water and energy consumption factors and the effectiveness of the mitigation measures identified above, and SCAG's lack of authority to implement project-level mitigation measures, this PEIR finds impacts related to greenhouse gas emissions and potential conflicts with applicable plans, policies and regulations to be significant and unavoidable.

6.9 HAZARDS AND HAZARDOUS MATERIALS

Impact HAZ-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM HAZ-1** through **SMM HAZ-3** and Project-Level Mitigation Measure **PMM HAZ-1** will reduce impacts related to the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in **Section 3.9, Hazards and Hazardous Materials**, of the PEIR. The potential to create a significant hazard to the public or the environment through routine transport or use of hazardous materials would be significant. Implementation of Mitigation Measure **SMM HAZ-1** through **SMM HAZ-3** and **PMM HAZ-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that the Plan could result in goods movement activities which can facilitate the movement of hazardous materials throughout the transportation network. Proposed freight rail enhancements and other goods movement capacity enhancements identified in the Plan could result in increased or new transport of hazardous materials or wastes. In addition, construction and maintenance of these projects would result in use of equipment that contains or uses routine hazardous materials (e.g., diesel-fuel, paint and cleaning solutions), and the transportation of excavated soil and/or groundwater containing contaminants from previously contaminated areas. Development projects anticipated to occur under the Plan would potentially involve the use of hazardous materials such as fuels, solvents, paints, and other architectural coatings. Therefore, the Plan would potentially create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Mitigation Measure **SMM HAZ-1** through **SMM HAZ-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM HAZ-1** would reduce impacts related to the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to hazards and hazardous materials, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional

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Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

SMM HAZ-1: SCAG shall work with the U.S. DOT, the Office of Environmental Service Caltrans, and the private sector to continue to conduct driver safety training programs and enforce speed limits on roadways. In an effort to reduce risks associated with the transport of hazardous materials in the SCAG region, SCAG shall encourage the U.S. Department of Transportation and the California Highway Patrol to continue to enforce speed limits and existing regulations governing goods movement and hazardous materials transportation.

SMM HAZ-2: SCAG shall notify member agencies of the importance of ensuring that construction and operation of transportation projects provide for the safe transport and disposal of hazardous waste, consistent with the provisions of HMR, 49 CFR Parts 171–180.

SMM HAZ-3: SCAG shall coordinate with the Office of Environmental Services to identify any transportation infrastructure elements within the SCAG region where risks to people and property occur at an above-average incident level, potentially warranting consideration for remedial design in future regional transportation plans (RTPs).

Project-Level Mitigation Measures

PMM HAZ-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 the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.
- b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance

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activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate.

- c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:
- The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids.
 - The location of such hazardous materials.
 - An emergency response plan including employee training information.
 - A plan that describes the way these materials are handled, transported and disposed.
- d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.
- e) Avoid overtopping construction equipment fuel gas tanks.
- f) Properly contain and remove grease and oils during routine maintenance of construction equipment.
- g) Properly dispose of discarded containers of fuels and other chemicals.
- h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.
- i) Identify and implement more stringent tank car safety standards.
- j) Improve rail transportation route analysis, and modification of routes based on that analysis.

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- k) Use the best available inspection equipment and protocols and implement positive train control.
- l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.
- m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.
- n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident.
- o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.
- p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.
- q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.

Impact HAZ-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM HAZ-1** through **SMM HAZ-3** and Project-Level Mitigation Measures **PMM HAZ-1** and **PMM HAZ-2** will reduce impacts related to the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, to the maximum extent

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practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.9, Hazards and Hazardous Materials, of the PEIR. The potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be significant. Implementation of Mitigation Measures **SMM HAZ-1** through **SMM HAZ-3**, **PMM HAZ-1**, and **PMM HAZ-2** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that the Plan may guide regional growth, including industrial types of uses that could generate hazardous materials. Transportation of goods, in general, and hazardous materials can thus be expected to increase substantially with implementation of the transportation projects included in the Plan. Therefore, the Plan would potentially create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Mitigation Measure **SMM HAZ-1** through **SMM HAZ-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM HAZ-1** and **PMM HAZ-2** would reduce impacts related to the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to hazards and hazardous materials, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See **SMM HAZ-1** through **SMM HAZ-3**.

Project-Level Mitigation Measures

See PMM HAZ-1.

PMM HAZ-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 hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following:

- a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment;
- b) More stringent tank car safety standards;
- c) Improved rail transportation route analysis, and modification of routes based on that analysis;
- d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control;
- e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size;
- f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments;
- g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident;
- h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.

Impact HAZ-3 **Potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM HAZ-1** through **SMM HAZ-3** and Project-Level Mitigation Measures **PMM HAZ-1** through **PMM HAZ-3** will reduce the impacts related to the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.9, Hazards and Hazardous Materials, of the PEIR. The potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would be significant. Implementation of Mitigation Measures **SMM HAZ-1** through **SMM HAZ-3** and **PMM HAZ-1** through **PMM HAZ-3** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that the Plan would develop transportation projects and more dense, compact urban development encouraged by land use strategies in the Plan, and as such there would be the potential for significant impacts related to the emission of hazardous materials or the handling of hazardous or acutely hazardous materials, substances and waste, within one-quarter mile of an existing or proposed school. Mitigation Measure **SMM HAZ-1** through **SMM HAZ-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM HAZ-1** through **PMM HAZ-3** would reduce impacts related to the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to hazards and hazardous materials, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

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Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

See **SMM HAZ-1** through **SMM HAZ-3**.

Project-Level Mitigation Measures

See **PMM HAZ-1** and **PMM HAZ-2**.

PMM HAZ-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 the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.
- b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.

Impact HAZ-4 **Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM HAZ-1** through **SMM HAZ-3** and Project-Level Mitigation Measure **PMM HAZ-4** will reduce the impacts related to the potential to create a significant hazard to the public or environment based on hazardous materials sites, to the maximum extent practicable

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and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.9, Hazards and Hazardous Materials, of the PEIR. The potential to create a significant hazard to the public or environment based on hazardous materials sites would be significant. Implementation of Mitigation Measures **SMM HAZ-1** through **SMM HAZ-3** and **PMM HAZ-3** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that construction related to transportation projects and anticipated development could occur adjacent to sites that are contaminated (buildings and/or soil and/or groundwater) due to past use or disposal of hazardous materials. Therefore, development under the Plan would potentially be located on a hazardous materials site. Mitigation Measure **SMM HAZ-1** through **SMM HAZ-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM HAZ-1** through **PMM HAZ-3** would reduce impacts related to a significant hazard to the public or environment based on hazardous materials sites, to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to hazards and hazardous materials, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See **SMM HAZ-1** through **SMM HAZ-3**.

Project-Level Mitigation Measures

PMM HAZ-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 projects that are located on a site which is

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included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.
- b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.
- c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.
- d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.
- e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.
- f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including,

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but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.

- g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.
- h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.
- i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.
- j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.
- k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.

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- l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.

- m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.

- n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.

- o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001-36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.

Impact HAZ-5 For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM NOISE-1** and **SMM HAZ-5** and Project-Level Mitigation Measures **PMM NOISE-1** and **PMM HAZ-6** will reduce the impacts related to safety hazards or excessive noise within an airport land use plan or within two miles of a public airport, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.9, Hazards and Hazardous Materials, of the PEIR. The potential to create impacts related to safety hazards or excessive noise within an airport land use plan or within two miles of a public airport would be significant. Implementation of Mitigation Measures **SMM NOISE-1** and **SMM HAZ-5** and Project-Level Mitigation Measures **PMM NOISE-1** and **PMM HAZ-6** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that the increased population growth accommodated under the Plan could result in increased air traffic in major commercial airports. Increased traffic could impact sensitive receptors, thereby exposing receptors to louder noise. Therefore, the Plan would potentially create impacts related to safety hazards or excessive noise within an airport land use plan or within two miles of a public airport. Mitigation Measure **SMM NOISE-1** and **SMM HAZ-5** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM-NOISE-1** and **PMM-HAZ-6** would reduce impacts related to the potential to create impacts related to safety hazards or excessive noise within an airport land use plan or within two miles of a public airport, to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to hazards and hazardous materials, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

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Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See **SMM NOISE-1**.

SMM HAZ-5: SCAG shall continue to collaborate with key stakeholders on regional aviation planning issues through the Aviation Technical Advisory Committee (ATAC). The ATAC is a partnership between the airports, transportation agencies and commissions, experts, and other community members.

Project-Level Mitigation Measures

PMM NOISE-1

Impact HAZ-6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Impact:

Significant and Unavoidable

Findings:

Implementation of SCAG Mitigation Measures **SMM HAZ-1** through **SMM HAZ-5** and Project-Level Mitigation Measures **PMM HAZ-1** through **PMM HAZ-5** and **PMM TRA-5** will reduce impacts related to the potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.9, Hazards and Hazardous Materials, of the PEIR. Implementation of **SMM HAZ-1** through **SMM HAZ-5** and **PMM HAZ-1** through **PMM HAZ-5** and **PMM TRA-5** would reduce impacts to the maximum extent practicable; however, impacts would remain significant and unavoidable.

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The SCAG Regional Council finds that construction activities from transportation projects included in the Plan, traffic and/or road closures in grade crossings, arterials, interchanges, and auxiliary lanes, could delay emergency vehicle response times or otherwise disrupt delivery of emergency response services. Therefore, the Plan would potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Mitigation Measure **SMM HAZ-1** through **SMM HAZ-5** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM HAZ-1** through **PMM HAZ-5**, and **PMM TRA-5** would reduce impacts related to the potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to hazards and hazardous materials, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See **SMM HAZ-1** through **SMM HAZ-5** and **SMM TRA-5**.

Project-Level Mitigation Measures

See **PMM HAZ-1** through **PMM HAZ-4** and **PMM TRA-5**.

PMM HAZ-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 substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.

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- b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;
- c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.

6.10 HYDROLOGY AND WATER QUALITY

Impact HYD-1 Potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM HYD-1** and Project-Level Mitigation Measure **PMM HYD-2** will reduce impacts related to the potential to degrade surface or groundwater quality, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.10, Hydrology and Water Quality, of the PEIR. The potential to substantially degrade surface or groundwater quality would be significant. Implementation of Mitigation Measures **SMM HYD-1** and **PMM HYD-2** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that grading, excavation, and other construction activities associated with transportation projects and development projects anticipated to occur under the Plan, could impact water quality due to erosion resulting from exposed soils that may be transported in stormwater runoff. Therefore, the Plan would potentially degrade surface or groundwater quality. Mitigation Measure **SMM HYD-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM HYD-2** would reduce impacts related to the potential to substantially degrade surface or groundwater quality, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in

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impacts related to hydrology and water quality, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

SMM HYD-1: SCAG shall continue to work with local jurisdictions and water quality agencies to encourage regional-scale planning for improved water quality management and pollution prevention. Future impacts to water quality shall be avoided to the extent practical and feasible through cooperative planning, information sharing, and comprehensive pollution control measure development within the SCAG region. This cooperative planning shall occur as part of current and existing coordination, an integral part of SCAG's ongoing regional planning efforts.

Project-Level Mitigation Measure

PMM HYD-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 from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.
- b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.
- c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control.

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- d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.
- e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.
- f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse:
- g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.
- h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities.
- i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.
- j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff.
- k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.
- l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion

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and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.

- m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.

Impact HYD-2 Potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM HYD-2** and Project-Level Mitigation Measure **PMM HYD-2** will reduce impacts related to the potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.10, Hydrology and Water Quality, of the PEIR. The potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted) would be significant. Implementation of Mitigation Measures **SMM HYD-2** and **PMM HYD-2** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that groundwater basins in the Plan area are already in a state of overdraft, and future development may result in a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted). Population growth of 3.2 million people by 2045 would increase regional water demand and could substantially deplete groundwater supplies. Additionally, urbanization to accommodate future growth would

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potentially increase impervious surfaces, thus affecting groundwater recharge. Therefore, the Plan would potentially deplete groundwater supplies or interfere substantially with groundwater recharge. Mitigation Measure **SMM HYD-2** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM HYD-2** would reduce impacts related to the potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to hydrology and water quality, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

SMM HYD-2: SCAG shall build from existing efforts including those at the sub-regional and local level and shall continue to work with local jurisdictions and water agencies, to encourage regional-scale planning for improved stormwater management and groundwater recharge, including consideration of alternative recharge technologies and practices. Future adverse impacts may be avoided through cooperative planning, information sharing, and comprehensive implementation efforts within the SCAG region.

Project-Level Mitigation Measures

PMM HYD-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 from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Avoid designs that require continual dewatering where feasible.

For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of

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the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.

- b) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.
- c) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.
- d) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.

Impact HYD-3a **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site.**

Impact HYD-3b **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of flooding on- or off-site.**

Impact HYD-3c **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM HYD-1** through **SMM HYD-3** and Project-Level Mitigation Measures **PMM HYD-1** and **PMM HYD-2** will reduce impacts related to the potential to substantially alter the existing drainage pattern of the site or area, to the maximum extent practicable and

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feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.10, Hydrology and Water Quality, of the PEIR. The potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on site or off site would be significant. Implementation of Mitigation Measures **SMM HYD-1** through **SMM HYD-3** and **PMM HYD-1** and **PMM HYD-2** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that implementation of the Plan's transportation projects as well as land use strategies may increase impervious surfaces, which in turn could increase urban runoff if not regulated, resulting in the transport of greater volumes of polluted water into storm drain systems. Therefore, the Plan would potentially alter the existing drainage pattern of the site or area. Mitigation Measure **SMM HYD-1** through **SMM HYD-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM HYD-1** and **PMM HYD-2** would reduce impacts related to the potential to substantially alter the existing drainage pattern of the site or area, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to hydrology and water quality, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See **SMM HYD-1** and **SMM HYD-2**.

SMM HYD-3: SCAG shall build from existing efforts including those at the sub-regional and local level and shall continue to work with local jurisdictions to encourage regional-scale planning for maintaining and/or improving existing drainage patterns. Future adverse impacts may be avoided through cooperative planning,

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information sharing, and comprehensive implementation efforts within the SCAG region.

Project-Level Mitigation Measures

See PMM HYD-1.

Impact HYD-4 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM HYD-4** and Project-Level Mitigation Measure **PMM HYD-4** will reduce impacts related to the risk of pollutant release due to inundation in flood hazard, tsunami, or seiche zones, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.10, Hydrology and Water Quality, of the PEIR. The risk of pollutant release due to inundation in flood hazard, tsunami, or seiche zones would be significant. Implementation of Mitigation Measures **SMM HYD-4** and **PMM HYD-4** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that projects developed under the Plan would be located in or near areas that are prone to flood, tsunami, or seiche zones. As such, the Plan would potentially increase the risk of pollutant release due to inundation in flood hazard, tsunami, or seiche zones. Mitigation Measure **SMM HYD-4** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM HYD-4** would reduce impacts related to the potential to substantially alter the existing drainage pattern of the site or area, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to hydrology and water quality, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

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Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

SMM HYD-4: SCAG shall continue to work with local jurisdictions and water quality agencies to encourage flood protection and prevent development in flood hazard areas that do not have appropriate protections. This shall be accomplished through cooperation and information sharing regarding specific alignments and rights-of-way planning for RTP projects, and regional program development as part of SCAG's ongoing regional planning efforts. These include but are not limited to web-based data distribution planning tools and sustainability programs in conjunction with local governments. Such services would potentially consist of an inventory of areas located in or near a 100-year flood hazard zone or hazard areas that would potentially be affected by a failure of a levee or dam; or inundation by seiche, tsunami, or mudflow.

Project-Level Mitigation Measure

PMM HYD-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 capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.

Impact HYD-5 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM HYD-2** and Project Level Mitigation Measure **PMM HYD-2** will reduce impacts related to the potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.10, Hydrology and Water Quality, of the PEIR. The potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan would be significant. Implementation of Mitigation Measures **SMM HYD-2** and **PMM HYD-2** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that implementation of Connect SoCal would increase impervious surfaces due to additional lane miles and conversion of greenfields to developed land. An increase in impervious surfaces would increase water runoff and potentially affect groundwater recharge rates and water quality in the basins. Therefore, the Plan may conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan and mitigation measures are required. Mitigation Measure **SMM HYD-2** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM HYD-2** would reduce impacts related to the potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to hydrology and water quality, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

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Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

See SMM HYD-2.

Project-Level Mitigation Measure

See PMM HYD-2.

6.11 LAND USE AND PLANNING

Impact LU-1 Potential for the Plan to physically divide an established community.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM LU-1** and Project-Level Mitigation Measure **PMM LU-1** will reduce impacts related to the potential to physically divide an established community, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.11, Land Use and Planning, of the PEIR. The potential to physically divide an established community would be significant. Implementation of Mitigation Measures **SMM LU-1** and **PMM LU-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that physical division of an established community could occur as a result of real or perceived barriers to pedestrians, bicyclists, and motorists. Short-term construction related impacts could result from disturbances due to construction equipment; these impacts are discussed under other impact categories (e.g., Noise, Aesthetics, and Air Quality). Long-term impacts could result from the completion of new or expanded roadways or transit facilities in existing communities. Anticipated

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significant impacts include substantial density increases in areas of the region adjacent to transit, or other rights-of-way that could separate residences from community facilities and services, and conversion of vacant lands, including agricultural lands, to transportation infrastructure and residential and commercial development. As such, the Plan would potentially physically divide an established community. Mitigation Measure SMM LU-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM LU-1** would reduce impacts related to the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to land use, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

SMM LU-1: SCAG shall coordinate with local County Transportation Commissions, Caltrans and other implementing agencies when siting new facilities in residential areas to facilitate minimizing future impacts of transportation 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.

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:

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- 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).
- c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:
- Alignment shifts to minimize the area affected.
 - Reduction of the proposed right-of-way take to minimize the overall area of impact.
 - Provisions for bicycle, pedestrian, and vehicle access across improved roadways.

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.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM LU-2** through **SMM LU-5** and Project-Level Mitigation Measure **PMM LU-2** will reduce impacts related to the potential to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.11, Land Use and Planning, of the PEIR. The potential to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, would be significant. Implementation of Mitigation

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Measures **SMM LU-2** through **SMM LU-5** and **PMM LU-2** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that there are areas subject to general plans that would be impacted by transportation projects. In addition, since the Plan's planning horizon year is beyond the timeline of many of the most recent general plans, implementation of the Plan's transportation projects and land use strategies could potentially result in changes in the land use patterns in the region. Therefore, there is potential for inconsistencies with general plans as well as regional conservation plans. As such, the Plan would potentially conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Mitigation Measure **SMM LU-2** through **SMM LU-5** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM LU-2** would reduce impacts related to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to land use, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

SMM LU-2: SCAG shall continue to promote the Intergovernmental Review (IGR) Program as an internal and external informational tool by reviewing and monitoring all projects submitted to SCAG for review and working with local jurisdictions to ensure that submitted projects support the most currently adopted Connect SoCal Plan. SCAG shall provide comment letters on regionally significant projects to recommend additional resources to help the lead agency support or develop a projects that are consistent with the Plan, as appropriate. The IGR Mapping Tool can also be utilized by local jurisdictions to assess regional impacts. To visit the IGR Mapping tool, please go to: <https://maps.scag.ca.gov/IGR/>. For more information on SCAG's IGR Program, please visit: <http://www.scag.ca.gov/programs/Pages/IGR.aspx>.

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SMM LU-3: SCAG shall encourage cities and counties in the region to provide SCAG with electronic versions of their most recent general plan (and associated environmental document) and any updates as they are produced.

SMM LU-4: SCAG shall continue to provide targeted technical services such as GIS and data support for cities and counties to update their general plans at least every ten years, as recommended by the Governor’s Office of Planning and Research.

SMM LU-5: SCAG shall provide technical assistance and regional leadership to encourage implementation of the Plan goals and strategies that integrate growth and land use planning with the existing and planned transportation network.

Project-Level Mitigation Measures

PMM LU-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 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) 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.

6.12 MINERAL RESOURCES

Impact MIN-1 **Potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM MIN-1** and Project-Level Mitigation Measure **PMM MIN-1** will reduce impacts related to the potential to result in the loss of availability of a known mineral

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resource that would be of value to the region and the residents of the state, to maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.12, Mineral Resources, of the PEIR. The potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state would be significant. Implementation of Mitigation Measures **SMM MIN-1** and **PMM MIN-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that construction of transportation projects contained in the Plan and development projects anticipated to occur under the Plan would require substantial amounts of aggregate resources for construction purpose. Therefore, the Plan would potentially result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Mitigation Measure **SMM MIN-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM MIN-1** would reduce impacts related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to mineral resources, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SMM MIN-1: SCAG shall coordinate with the Department of Conservation, California Geological Survey to maintain a database of (1) available mineral resources in the SCAG region including permitted and unpermitted aggregate resources and (2) the anticipated 50-year demand for aggregate and other mineral resources. Based on the results of this survey, SCAG shall work with local agencies on strategies to address anticipated demand, including identifying future sites that may seek permitting and working with industry experts to identify ways to encourage and increase recycling to reduce the demand for aggregate.

Project-Level Mitigation Measures

PMM MIN-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 the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.
- b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as:
 - 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.
 - 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.
 - 3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.
 - 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.

Impact MIN-2 **Potential to result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM MIN-1** and Project-Level Mitigation Measure **PMM MIN-1** will reduce impacts related to the potential to result in the loss of availability of a locally important mineral resource recovery site, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.12, Mineral Resources, of the PEIR. The potential to result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan would be significant. Implementation of Mitigation Measures **SMM MIN-1** and **PMM MIN-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that construction of transportation projects contained in the Plan and development projects anticipated to occur under the Plan would require substantial amounts of aggregate resources for construction purpose. Therefore, the Plan would potentially result in loss of the availability of locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Mitigation Measure **SMM MIN-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM MIN-1** would reduce impacts related to the loss of locally important mineral resource recovery sites delineated on a local general plan to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in noise impacts, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional

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Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

See SMM MIN-1.

Project-Level Mitigation Measure

See PMM-MIN-1.

6.13 NOISE

Impact Noise-1 Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM-NOISE-1** and Project-Level Mitigation Measure **PMM NOISE-1** levels in excess of established standards, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.13, Noise, of the PEIR. The potential to result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies would be significant. Implementation of Mitigation Measures **SMM-NOISE-1** and **PMM NOISE-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that grading and construction activities would generate temporary increases in noise levels, and operational activities would generate permanent increases in noise levels in excess of standards established in the local general plan or noise ordinance. As the Plan is expected to result in the conversion of greenfield areas, there is the potential for increased ambient noise in suburban and rural areas. Because of the nature of noise impacts (noise dissipates with distance from the source), new

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transportation operations may cause noise impacts, and those impacts may exceed applicable noise thresholds for determining significance within a localized area, but those impacts cannot be quantified at a regional level. Therefore, the Plan would potentially result in exposure of persons to or generation of noise levels in excess of established standards. Mitigation Measure SMM NOISE-1 would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM NOISE-1** would reduce adverse effects on ambient noise levels to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in noise impacts, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

SMM-NOISE-1: SCAG shall coordinate with CTCs and member agencies as part of SCAG’s outreach and technical assistance to local governments to encourage transportation projects and projects involving residential and commercial land uses to mitigate noise and vibration or be developed in areas that are normally acceptable or conditionally acceptable, consistent with applicable guidelines (i.e., OPR, Caltrans, etc.).

Project-Level Mitigation Measures

PMM NOISE-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. Install temporary noise barriers during construction.
- b. Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.

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- c. Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance
- d. Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.
- e. Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.
- f. Designate an on-site construction complaint and enforcement manager for the project.
- g. Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- h. Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.

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- i. Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.
- j. Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.
- k. Using rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned
- l. Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.
- m. Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses;
- n. Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.
- o. Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
- p. Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.

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- q. Use of portable barriers in the vicinity of sensitive receptors during construction.
- r. Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts.
- s. Monitor the effectiveness of noise attenuation measures by taking noise measurements.
- t. Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.
- u. Construct sound reducing barriers between noise sources and noise-sensitive land uses.
- v. Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.
- w. Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.
- x. Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.
- y. Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.

Impact NOI-2 Generation of excessive groundborne vibration or groundborne noise levels.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM NOISE-1** and Project-Level Mitigation Measures **PMM-NOISE-1** and **PMM-NOISE-2** will reduce impacts related to the potential to result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.13, Noise, of the PEIR. The potential to result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels would be significant. Implementation of Mitigation Measures **SMM NOISE-1**, **PMM-NOISE-1**, and **PMM-NOISE-2** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that transportation projects and development anticipated to occur under the Plan could result in temporary noise and vibration impacts from grading, paving, clearing, landscaping, staging, excavation, earthmoving, and other related construction activities. Land use strategies would encourage compact development which would encourage more people in urbanized areas where vibration impacts would occur. As such, the Plan would potentially result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. Mitigation Measure **SMM NOISE-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM-NOISE-1** and **PMM-NOISE-2** would reduce adverse effects on ambient noise levels to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in noise impacts, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional

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Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

See **SMM NOISE-1**.

Project-Level Mitigation Measures

See **PMM-NOISE-1**.

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. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a. For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.
- b. For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.
- c. For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.
- d. Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.

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- e. Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).
- f. Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.

Impact NOI-3 **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM NOISE-1** and Project-Level Mitigation Measures **PMM-NOISE-1** will reduce impacts related to public airport or public use airport noise levels, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.13, Noise, of the PEIR. The potential to result in the exposure of persons to public airport or public use airport noise levels would be significant. Implementation of Mitigation Measures **SMM NOISE-1** and **PMM-NOISE-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds increased population growth accommodated under the Plan would result in increased air traffic in major commercial airports. Increased traffic could impact sensitive receptors, thereby exposing receptors to louder noise. Therefore, the Plan would potentially result in the exposure of persons to public airport or public use airport noise levels. Mitigation Measure **SMM NOISE-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-NOISE-1** would reduce adverse effects on ambient noise levels to the maximum extent feasible because they require lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by

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CEQA. While mitigation may provide a reduction in noise impacts, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See SMM NOISE-1.

Project-Level Mitigation Measures

See PMM NOISE-1.

6.14 POPULATION AND HOUSING

Impact POP-1 **Induce substantial unplanned population growth to areas of the region either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., by extending roads and other infrastructure).**

Impact:

Significant and Unavoidable

Findings:

Implementation of SCAG Mitigation Measures **SMM-POP-1** through **SMM-POP-4** will reduce impacts related to the potential to induce substantial unplanned population growth in an area, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.14, Population and Housing of the PEIR. The potential to induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure) would be significant. Implementation of Mitigation Measures **SMM-POP-1** through **SMM-POP-4** would reduce impacts; however, impacts would remain significant and unavoidable.

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The SCAG Regional Council finds that the Plan's 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 underdeveloped. Therefore, the Plan would potentially induce substantial unplanned population growth in an area. Mitigation Measure **SMM POP-1** through **SMM POP-4** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM LU-1** would reduce adverse effects on growth inducement to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

SMM-POP-1: SCAG shall promote the Sustainability Program which will provide technical assistance to local jurisdictions that support local planning and implementation of the Connect SoCal Plan. The program recognizes sustainable solutions to local growth challenges and will result in local plans that promote sustainability through the integration of transportation and land use. For more information please visit: <http://sustain.scag.ca.gov/Documents/Sustainable%20Communities%20Program%20Guidelines.pdf>.

SMM-POP-2: SCAG shall provide technical assistance to local governments, transit agencies and developers within the region to build housing capacity to compete in the statewide Affordable Housing Sustainable Communities (AHSC) grants program. The AHSC program is one of the few state funding opportunities to address housing shortages within the state. For more information please visit: <http://ahsc.scag.ca.gov/Pages/Home.aspx>.

SMM-POP-3: SCAG shall host summits that addresses the housing crisis and provides solutions to build more housing. Examples include the 2016 Housing Summit (<http://www.scag.ca.gov/SiteAssets/HousingSummit/index.html>) and the Eighth Annual Economic Summit (<https://www.scag.ca.gov/calendar/Pages/8thEconomicSummit.aspx>).

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SMM-POP-4: SCAG shall continue to produce the biennial Local Profile reports for all member jurisdictions in the SCAG region for the purpose of data and information sharing. The Local Profiles reports provide a variety of demographic, economic, education, housing, and transportation information that local jurisdictions can utilize like project and program planning. For more information about the most recently release 2019 Local Profiles, please visit: <http://www.scag.ca.gov/DataAndTools/Pages/LocalProfiles.aspx>.

Impact POP-2 **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.**

Impact:

Significant and Unavoidable

Findings:

Implementation of SCAG Mitigation Measures **SMM-POP-4** and **SMM-POP-5** and Project-Level Mitigation Measure **PMM-POP-1** will reduce the potential to displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.14, Population and Housing, of the PEIR. The potential to displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere would be significant. Implementation of Mitigation Measures **SMM-PHE-4**, **SMM-PHE-5**, and **PMM-POP-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that land use strategies in urbanized areas, could displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere. Mitigation Measure **SMM POP-4** and **SMM POP-5** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-POP-1** would reduce adverse effects related to the displacement of substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere, to the maximum extent feasible, because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related

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to the displacement and reconstruction of housing, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Level Mitigation Measure

See SMM-POP-4.

SMM-POP-5: SCAG shall assist cities to identify funding and financing opportunities and potential partnerships for public infrastructure improvements for transit-oriented development and other smart growth projects.

Project-Level Mitigation Measures

PMM-POP-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 the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.
- Prioritize the use existing ROWs, wherever feasible.
- Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.
- Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable).
- When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.

6.15 PUBLIC SERVICES

Impact PSF-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM PSP-1** through **SMM PSP-4**, **SMM PSF-1**, **SMM PSF-2**, and Project-Level Mitigation Measure **PMM-PSP-1** will reduce impacts related to the potential to increase in the use of fire protection services such that a need for new or physically altered fire protection facilities would become necessary, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.15.1, Fire Protection, of the PEIR. The potential for increased demand for fire protection services would be significant. Implementation of Mitigation Measures **SMM PSP-1** through **SMM PSP-4**, **SMM PSF-1**, **SMM PSF-2**, and **PMM-PSP-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that construction activities associated with transportation and potential development projects may temporarily increase demand on fire protection and emergency medical services. Increased growth as well as more dense development (e.g., more families living and/or working in such areas), anticipated to occur under implementation of Connect SoCal could affect the need for additional services. Therefore, the Plan would potentially increase the demand for fire protection services. Mitigation Measure **SMM PSP-1** through **SMM PSP-4**, **SMM PSF-1**, **SMM PSF-2** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-PSP-1** would reduce adverse effects related to the potential increased demand for fire protection services to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as

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required by CEQA. While mitigation may provide a reduction in fire protection impacts, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See SMM PSP-1 through SMM PSP-4.

SMM PSF-1: SCAG shall assist planners, first responders, and recovery teams in a supporting role, in three key areas, before a major emergency and during the recovery period:

- Provide a policy forum to help develop regional consensus and education on security policies and emergency responses.
- Assist in expediting the planning and programming of transportation infrastructure repairs from major disasters.
- Encourage integration of transportation security measures into transportation projects early in the project development process by leveraging SCAG's relevant plans, programs, and processes, including regional ITS architecture. An example includes SCAG's participation in the development of the Southern California Catastrophic Earthquake Preparedness Plan.⁷

SMM PSF-2: SCAG shall facilitate minimizing future impacts to fire protection services through information sharing regarding Fire-wise Land Management (data regarding fire-resistant vegetation, fire-resistant materials, locations where development is potentially hazardous in regard to wildfire, and management of brush and other fire risks in the immediate vicinity of development in areas with high fire threat) with county and city planning departments.

⁷ California Emergency Management Agency, *Southern California Catastrophic Earthquake Response Plan*, December 2010
[https://www.caloes.ca.gov/PlanningPreparednessSite/Documents/SoCalCatastrophicConops\(Public\)2010.pdf](https://www.caloes.ca.gov/PlanningPreparednessSite/Documents/SoCalCatastrophicConops(Public)2010.pdf), accessed October 31, 2019.

Project-Level Mitigation Measures

See PMM-PSP-1.

6.16 POLICE PROTECTION

Impact PSP-1 **Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM PSP-1** through **SMM PSP-4**, **SMM PSF-1**, **SMM PSF-2**, and Project-Level Mitigation Measure **PMM-PSP-1** will reduce impacts related to the potential to increase in need for police protection services such that the need for new or physically altered police protection facilities would become necessary, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.15.2, Police Protection, of the PEIR. The potential for increased demand for police protection services would be significant. Implementation of Mitigation Measures **SMM PSP-1** through **SMM PSP-4**, **SMM PSF-1**, **SMM PSF-2**, and **PMM-PSP-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that construction activities associated with transportation and development projects may temporarily increase demand on police services. Increased growth as well as more dense development (e.g., more families living and/or working in such areas), anticipated to occur under implementation of Connect SoCal could affect the need for additional services. Therefore, the Plan would potentially increase the demand for police protection services. Mitigation Measure **SMM PSP-1** through **SMM PSP-4**, **SMM PSF-1**, and **SMM PSF-2** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-PSP-1** would reduce adverse effects related to the potential increased demand

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for police protection services to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in police impacts, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See **SMM PSF-1** and **SMM PSF-2**

SMM PSP-1 SCAG shall facilitate minimizing future impacts to library services through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to Map Gallery, GIS library, and GIS applications, and promote acceptable service ratios regarding library services.

SMM PSP-2: SCAG shall help to enhance the region's ability to deter and respond to acts of terrorism, human-caused or natural disasters through regionally cooperative and collaborative strategies. SCAG shall work with local officials to develop regional consensus on regional transportation safety, security, and safety security policies.

SMM PSP-3: SCAG shall help to enhance the region's ability to deter and respond to terrorist incidents, human-caused or natural disasters by strengthening relationship and coordination with transportation. This will be accomplished by the following:

- SCAG shall work with local officials to develop regional consensus on regional transportation safety, security, and safety security policies.
- SCAG shall encourage all SCAG elected officials are educated in NIMS.
- SCAG shall work with partner agencies, federal, state and local jurisdictions to improve communications and interoperability and to find opportunities to leverage and effectively utilize transportation and public safety/security resources in support of this effort.

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SMM PSP-4: SCAG shall encourage and provide a forum for local jurisdictions to develop mutual aid agreements for essential government services during any incident recovery.

Project-Level Mitigation Measures

PMM PSP-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 of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated in to the project description.
- b) Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts.
- c) Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.

Impact PSS-1 **Result in substantial adverse physical impacts associated with the provision of new or physically altered educational facilities, need for new or physically altered educational facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM PSS-1** and Project-Level Mitigation Measure **PMM-PSS-1** will reduce impacts related to the potential increase in use of schools such that the need for new or physically altered schools facilities would become necessary, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.15.3, Schools, of the PEIR. The potential for increased demand for education services would be significant. Implementation of Mitigation Measure **SMM PSS-1** and **PMM-PSS-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that population is anticipated to increase by approximately 3.2 million people over the lifetime of the Plan (with or without the Plan); some of this population increase would include school age children, thus the need for additional schools. Therefore, the Plan would potentially increase the demand for education services. Mitigation Measure **SMM PSS-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-PSS-1** would reduce adverse effects related to the potential increased demand for schools to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in school impacts, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

SMM PSS-1: SCAG shall facilitate minimizing future impacts to school services through cooperation, information sharing, and regional program development as part of SCAG’s ongoing regional planning efforts, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library,

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and GIS applications, and direct technical assistance efforts to promote school planning efforts.

Project-Level Mitigation Measures

PMM PSS-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 of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.

Impact PSL-1 **Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM PSL-1** and Project-Level Mitigation Measure **PMM-PSL-1** will reduce impacts related to the potential increase in use of libraries such that the need for new or physically altered library facilities would become necessary, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.15.4, Libraries, of the PEIR. The potential for increased demand for libraries would be significant. Implementation of Mitigation Measure **SMM PSL-1** and **PMM-PSL-1** would reduce impacts; however, impacts would remain significant and unavoidable.

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The SCAG Regional Council finds that new transportation facilities, especially those in urban areas, could facilitate access to libraries and result in increased use of some libraries. In addition, the anticipated growth in population and households would increase the demand for library facilities, which may result in a need for new and/or expanded library facilities. Therefore, the Plan would potentially increase the demand for library services. Mitigation Measure **SMM PSL-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-PSL-1** would reduce adverse effects related to the potential increased demand for libraries to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in library impacts, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

SMM PSL-1 SCAG shall facilitate minimizing future impacts to library services through cooperation, information sharing, and regional program development as part of SCAG’s ongoing regional planning efforts, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to Map Gallery, GIS library, and GIS applications, and promote acceptable service ratios regarding library services.

Project-Level Mitigation Measure

PMM PSL-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 of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.

6.17 PARKS AND RECREATION

Impact REC-1 **Potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM REC-1**, **SMM USWS-1** and Project-Level Mitigation Measure **PMM REC-1** will reduce impacts related to the potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.16, Recreation, of the PEIR. The potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated would be significant. Implementation of Mitigation Measures **SMM REC-1** and **PMM REC-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that the Plan's transportation improvements aim to accommodate the anticipated population increase of approximately 3.2 million persons over the lifetime of the Plan. The Plan may influence new growth, primarily within urbanized areas such as HQTAs and other livable corridors and centers. Therefore, it is possible that existing neighborhood parks and other recreational facilities would see an increase in usage, which, in turn, may result in substantial physical deterioration of facilities. Therefore, the Plan would potentially increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Mitigation Measure **SMM REC-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM REC-1** would reduce adverse effects related to the potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated to the maximum extent feasible because it

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requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in recreation impacts, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

See SMM USWS-1.

SMM REC-1: SCAG shall continue the commitment to analyze public health outcomes as part of the Regional Transportation Plan/Sustainable Communities Strategy (Plan). As part of the public health analysis for the Plan, SCAG shall continue to analyze resident access to parks and recreational facilities from a county level to help local jurisdictions to improve resident access to parks. SCAG shall communicate the impacts of the Plan through its Public Health Working group, and continue to support policy changes at the city and county level through educational programs.

Project-Level Mitigation Measures

PMM REC-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 the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.
- b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns

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of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:

- i. Increasing the accessibility to natural areas for outdoor recreation
- ii. Utilizing “green” development techniques
- iii. Promoting water-efficient land use and development
- iv. Encouraging multiple uses, such as the joint use of schools
- v. Including trail systems and trail segments in General Plan recreation standards

Impact REC-2 **Potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM REC-1** and Project-Level Mitigation Measures **PMM REC-1, PMM AQ-2, and PMM NOISE-1** will reduce impacts related to the potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.16, Recreation of the PEIR. The potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment would be significant. Implementation of Mitigation Measures **SMM REC-1, PMM REC-1, PMM AQ-2, and PMM NOISE-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that the land use framework of the Plan assumes an increase in small-lot, single- and multi-family housing that is expected to mainly occur in infill locations near transit infrastructure (HQTAs and transit priority areas [TPAs]), and transit-oriented communities. This increased density in urban areas will increase demand and place strain for parks and recreational facilities in these

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areas. Therefore, the Plan would potentially require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Mitigation Measure **SMM REC-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM REC-1**, **PMM AQ-2**, and **PMM NOISE-1** would reduce adverse effects related to the potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in recreation impacts, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

See **SMM REC-1**.

Project-Level Mitigation Measures

See **PMM REC-1**, **PMM AQ-2**, and **PMM NOISE-1**.

6.18 TRANSPORTATION, TRAFFIC, AND SAFETY

Impact TRA-2 **Conflict or be inconsistent with CEQA Guidelines section 15064.3(b).**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM TRA-1** through **SMM TRA-6** and **PMM-TRA-1** will reduce impacts related to the potential to conflict with *CEQA Guidelines* section 15064.3(b) (which sets forth the criteria for analyzing transportation impacts), to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.17, Transportation, Traffic, and Safety, of the PEIR. The potential to conflict with *CEQA Guidelines* section 15064.3(b) would be significant. Implementation of Mitigation Measures **SMM TRA-1** through **SMM TRA-6** and **PMM-TRA-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that despite the benefits shown by implementing the Plan, the transportation projects and growth under the Plan would substantially increase VMT, which would be inconsistent and may not support achievement of the state's VMT goals as identified in the 2017 Scoping Plan. Therefore, the Plan would potentially conflict with *CEQA Guidelines* section 15064.3(b). Mitigation Measure **SMM TRA-1** through **SMM TRA-6** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-TRA-1** would reduce adverse effects on transportation, traffic, and safety, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in related to transportation, traffic, and safety, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

SMM TRA-1: SCAG shall facilitate minimizing VMT and related vehicular delay by minimizing impacts to circulation and access, improve mobility, and encourage transit and Active Transportation via workshops (i.e., Mobility 21 workshop and Regional Transportation Workgroups) and web-based planning tools for local governments, forums with policy makers, and County Transportation Planning Agencies, member cities, and state partners.

SMM TRA-2: SCAG shall identify further reduction in VMT, and fuel consumption that could be obtained through land-use strategies, additional car-sharing programs with linkage to public transportation, additional vanpools, additional bicycle sharing and parking programs, and implementation of a universal employee transit access pass (TAP) program.

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SMM TRA-3: SCAG shall initiate and facilitate an 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. This coordinated program of technical guidance, evaluation of options, and cooperative engagement with local communities will serve to smooth the transition to the new VMT-reducing development paradigm, helping to ensure a successful region-wide implementation of SB 743 and attainment of the associated GHG reduction goals. Some of the primary features of the scope of work include:

- Evaluate the feasibility of various alternative VMT mitigation options, including local and regional VMT exchange and banking programs.
- Establish CEQA nexus to reduce VMT through a VMT mitigation exchange or banking program alternative.
- Substantiate the legal basis of a VMT exchange program for satisfying CEQA mitigation requirements.
- Collaborate with other communities and jurisdictions to reduce VMT through implementation of a VMT mitigation exchange or bank program.
- Improve the dissemination of transportation project VMT mitigation options.
- Support a variety of TDM strategies for Transportation Management Organization (TMO) membership agencies.
- Provide guidance to facilitate establishment of VMT mitigation exchange or bank programs throughout the region and state

SMM TRA-4: SCAG shall continue to analyze and develop potential implementation strategies for a regional, market-based system to price or charge for auto trips during peak hours.

SMM TRA-5: SCAG shall develop a vanpool program for SCAG employees' commute trips.

SMM TRA-6: SCAG shall encourage new developments to incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation.

Project-Level Mitigation Measures

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. Such measures may include the following or other comparable measures identified by the Lead Agency:

- Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration's publication: *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways:
 - include TDM mitigation requirements for new developments;
 - incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks;
 - provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing;
 - implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools;
 - develop TDM-specific performance measures to evaluate project-specific and system-wide performance;
 - incorporate TDM performance measures in the decision-making process for identifying transportation investments;
 - implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and
 - set aside funding for TDM initiatives.

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- The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.

Impact TRA-4 Result in inadequate emergency access.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM TRA-7** and **SMM TRA-8** and Project-Level Mitigation Measure **PMM TRA-2** will reduce impacts related to the potential to result in inadequate emergency access, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.17, Transportation, Traffic, and Safety, of the PEIR. The potential to result in inadequate emergency access would be significant. Implementation of Mitigation Measures **SMM TRA-7**, **SMM TRA-8**, and **PMM TRA-2** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that transportation projects (including grade crossings, arterials, interchanges, and auxiliary lanes), could result in delayed emergency vehicle response times or otherwise disrupt delivery of emergency response services. Therefore the Plan would potentially result in inadequate emergency access. Mitigation Measure **SMM TRA-7** and **SMM TRA-8** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM TRA-2** would reduce adverse effects on transportation, traffic, and safety, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in related to transportation, traffic, and safety, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

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Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

SMM TRA-7: SCAG shall, in cooperation with local and state agencies, identify critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. In addition, SCAG shall establish transportation infrastructure practices that promote and enhance security.

SMM TRA-8: SCAG shall provide the means for collaboration in planning, communication, and information sharing before, during, or after a regional emergency. This will be accomplished by the following:

- SCAG shall develop and incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities.
- SCAG shall offer a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format.
- SCAG shall enter into mutual aid agreements with other MPOs (as feasible) to provide this data, in coordination with the California OES in the event that an event disrupts SCAG's ability to function.

Project-Level Mitigation Measures

PMM TRA-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 which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The

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project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:

- Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.
- Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.
- Scheduling of truck trips outside of peak morning and evening commute hours.
- Limiting of lane closures during peak hours to the extent possible.
- Usage of haul routes minimizing truck traffic on local roadways to the extent possible.
- Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.
- Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.
- Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.
- Storage of construction materials only in designated areas.

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- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.
- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.
- Enhance emergency preparedness awareness among public agencies and with the public at large.

6.19 TRIBAL CULTURAL RESOURCES

Impact TCR-2 **Cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code section 21074 that is:**

- a) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**

A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM TCR-1** and Project-Level Mitigation Measures **PMM TCR-1** and **PMM CULT-1** will reduce impacts related to the potential to cause a substantial adverse change in the significance of a historical resource, including tribal cultural resources, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.18, Tribal Cultural Resources, of the PEIR. The potential to cause a substantial adverse change in the significance of a tribal cultural resources, as defined in CEQA Guidelines Section 15064.5, would be significant. Implementation of Mitigation Measures **SMM TCR-1**, **PMM TCR-1**, and **PMM CULT-1** would reduce these impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that while there are state requirements in place to minimize adverse impacts to tribal cultural resources, there is still the potential for access-related damage associated with construction and operation of projects under the Plan. Therefore, the Plan would potentially cause a substantial adverse effect on the significance of a tribal cultural resource. Mitigation Measure **SMM TCR-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM TCR-1** and **PMM CULT-1** would reduce adverse effects on tribal cultural resources, to the maximum extent feasible, because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts to tribal cultural resources, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

SMM TCR-1: Impacts to tribal cultural resources shall be minimized through cooperation, information sharing, and SCAG's ongoing regional planning efforts such as web-based planning tools for local governments including CA LOTS, and other GIS tools and data services, including, but not limiting to, Map Gallery, GIS library, and GIS applications; and direct technical assistance efforts and sharing of associated online Training materials. SCAG shall consult with the Native American Heritage Commission, as well as Native American tribes, to identify opportunities for early and effective consultation to identify tribal cultural resources to avoid such resources wherever practicable and feasible and reduce or mitigate for conflicts in compatible land use to the maximum extent practicable.

Project Level Mitigation Measures

See PMM CULT-1.

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. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria;
- b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource;
- c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.

6.20 UTILITIES AND SERVICE SYSTEMS

Impact USSW-1 **Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals**

Impact USSW-2 **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM USSW-1** through **SMM USSW-2** and Project-Level Mitigation Measure **PMM USSW-2** will reduce impacts related to the potential to be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs, to the

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maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.19.1 Solid Waste, of the PEIR. The impact to be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs would be significant. Implementation of Mitigation Measures **SMM USSW-1**, **SMM USSW-2**, and **PMM USSW-2** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that the volume of solid waste debris expected to be generated with implementation of the Plan would increase compared to existing conditions. Additionally, landfill lifetimes do not extend out 25 years. Therefore, development as a result of implementation of the Plan would potentially need to be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs. Mitigation Measure **SMM USSW-1** and **SMM USSW-2** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM USSW-2** would reduce adverse effects on landfill capacity, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to utilities and service systems, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

SMM USSW-1: During the planning, design, and project-level CEQA review process for individual development projects, SCAG shall coordinate with waste management agencies and the appropriate local and regional jurisdictions to facilitate the development of measures and to encourage diversion of solid waste such as recycling and composting programs, as needed. This includes discouraging siting of new landfills unless all other waste reduction and prevention actions have been fully explored to minimize impacts to neighborhoods.

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SMM USSW-2: SCAG shall coordinate with waste management agencies, and the appropriate local and regional jurisdictions, measures to facilitate and encourage diversion of solid waste such as recycling and composting programs.

Project-Level Mitigation Measures

PMM USSW-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 the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following:

- a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.
- b) Inclusion of a waste management plan that promotes maximum C&D diversion.
- c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).
- d) Reuse of existing structure and shell in renovation projects.
- e) Development of indoor recycling program and space.
- f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.
- g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or

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electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required.

- h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target.
- i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.
- j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities.
- k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.
- l) Integrate reuse and recycling into residential industrial, institutional and commercial projects.
- m) Provide education and publicity about reducing waste and available recycling services.
- n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.

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Impact USWW-1 **Require or result in the relocation or construction of new or expanded wastewater treatment or storm drainage facilities, the construction or relocation of which could cause significant environmental effects**

Impact USWW-2 **Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM-USWW-1** and Project-Level Mitigation Measures **PMM-USWW-1** and **PMM-HYD-1** will reduce impacts related to the potential to require or result in construction of new storm water drainage facilities or expansion of existing facilities, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.19.2, Wastewater, of the PEIR. The impact to require or result in construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects would be significant. Implementation of Mitigation Measures **SMM-USWW-1**, **SMM HYD-1** through **SMM HYD-3**, **PMM-USWW-1**, and **PMM-HYD-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that development as a result of implementation of the Plan would increase impervious surface area throughout the region, thereby increasing urban runoff. Additionally, construction activities related or identified in the Plan could increase pollutant loads carried by storm water runoff. Therefore, the Plan would potentially require or result in construction of new storm water drainage facilities or expansion of existing facilities. Mitigation Measure **SMM USWW-1**, **SMM HYD-1**, **SMM HYD-2** and **SMM HYD-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM-USWW-1** and **PMM-HYD-1** would reduce adverse effects on stormwater drainage systems to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt

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all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to utilities and service systems, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

See SMM HYD-1 through SMM HYD-3.

SMM-USWW-1: SCAG shall work with local jurisdictions and wastewater agencies to encourage regional-scale planning for improved wastewater and stormwater management. Future impacts to wastewater and stormwater facilities shall be avoided to the extent practical and feasible through cooperative planning, information sharing, and comprehensive pollution control measure development within the SCAG region. This cooperative planning shall occur as part of current and existing coordination, an integral part of SCAG's ongoing regional planning efforts.

Project-Level Mitigation Measures

See PMM-HYD-1.

PMM-USWW-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 utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- During the design and CEQA review of individual future projects, implementing agencies and projects 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

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that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility 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.

Impact USWS-1 **Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM USWS-1** and Project-Level Mitigation Measure **PMM-USWS-1** will reduce impacts related to the relocation or construction of new or expanded water facilities, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.19.3 Water Supply, of the PEIR. The impacts related to the relocation or construction of new or expanded water facilities would be significant. Implementation of Mitigation Measures **SMM USWS-1** and **PMM-USWS-1** would reduce impacts; however, impacts would remain significant and unavoidable.

The SCAG Regional Council finds that accommodating the population guided by the Plan would increase the water demand in certain areas of the Region. Therefore, the Plan would potentially result in the relocation or construction of new or expanded water facilities. Mitigation Measure **SMM USWS-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-USWS-1** would reduce adverse effects on regional and local water supplies to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to utilities and service systems, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

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Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

SMM USWS-1: SCAG shall coordinate with local agencies as part of SCAG's Sustainability Program regarding the implementation of Urban Greening, Greenbelts and Community Separator land use strategies. Primary features of land use strategies address the following:

- Increased trail and greenway connectivity;
- Improved water quality, groundwater recharge and watershed health;
- Strategies for stormwater and rainwater collection, infiltration, treatment and release;
- Reduce urban runoff;
- Expand the urban forest;
- Provision of wildlife habitat and increased biodiversity;
- Expand recreation opportunities and beautification;
- Preserving agrarian economies;
- Restore severed wildlife corridors.

Project-Level Mitigation Measures

PMM USWS-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 ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.

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- b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.
- c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.
- d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.

Impact USWS-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measure **SMM USWS-1** and Project-Level Mitigation Measure **PMM-USWS-1** will reduce impacts related to the potential have insufficient water supplies available to serve the project from existing entitlements and resources or require new or expanded entitlements, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.19.3, Water Supply, of the PEIR. The impact to have sufficient water supplies available to serve the project from existing entitlements and resources or will require new or expanded entitlements would be significant. Implementation of Mitigation Measures **SMM USWS-1** and **PMM-USWS-1** would reduce impacts; however, impacts would remain significant and unavoidable.

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The SCAG Regional Council finds that transportation projects and development projects anticipated to occur under the Plan have the potential to result in water use that could exceed available water supply. Therefore, the Plan would potentially result in insufficient water supplies available to serve the project from existing entitlements and resources or require new or expanded entitlements. Mitigation Measure **SMM USWS-1** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM-USWS-1** would reduce adverse effects on regional and local water supplies to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to utilities and service systems, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measure

See **SMM USWS-1**.

Project-Level Mitigation Measures

See **PMM-USWS-1**.

6.21 WILDFIRE

Impact WF-2 **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.**

Impact HAZ-7 **Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.**

Impact:

Significant and Unavoidable

Finding:

Implementation of SCAG Mitigation Measures **SMM WF-1** through **SMM WF-3** and Project-Level Mitigation Measure **PMM WF-1** will reduce impacts related to the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.20, Wildfire, of the PEIR. Implementation of Mitigation Measures **SMM WF-1** through **SMM WF-3** and Project-Level Mitigation Measure **PMM WF-1** would reduce the level of impacts; however, the impacts would remain significant and unavoidable.

The SCAG Regional Council finds that transportation projects and anticipated development projects may be located in wildfire-prone areas. Therefore, implementation of the Plan would potentially expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Mitigation Measure **SMM WF-1** through **SMM WF-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measure **PMM WF-1** would reduce impacts related to the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to hazards and hazardous materials, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

- SMM WF-1:** SCAG shall facilitate minimizing future impacts to fire protection services through information sharing regarding Fire-wise Land Management (vegetation data, fire-resistant building materials, locations where development is vulnerable to wildfire, and best practices for safe land management) with county and city planning departments. Furthermore, SCAG shall examine wildfire risk management strategies in areas where at-risk critical electrical infrastructure is located based on CPUC and CAL FIRE maps.
- SMM WF-2:** SCAG, in partnership with technical experts and stakeholders shall launch or continue existing initiatives to help local cities and counties to protect Southern California communities and economies from the disruption of wildfire occurrences. Initiatives could include but not be limited to seminars that review the risk of wildfire and approaches for preparation, including strengthening of infrastructure, emergency services, emergency evacuation plans and reviewing building safety codes.
- SMM WF-3:** SCAG shall develop a regional resilience program and identify specific strategies to reduce vulnerabilities from natural disasters related to land based or atmospheric hazards, climate change, wildfire and other extreme weather events.

Project-Level Mitigation Measures

- PMM WF-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 wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:
- a) 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.
 - b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place.
 - c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary.

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- d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses.
- e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.
- f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place

Impact WF-3 **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment.**

Finding:

Implementation of SCAG Mitigation Measures **SMM-WF-1**, **SMM WF-2**, **SMM AG-4**, and **SMM BIO-3** and Project-Level Mitigation Measure **PMM WF-1** and **PMM HAZ-4** will reduce impacts related to infrastructure that may exacerbate fire risks, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.20, Wildfire, of the PEIR. Implementation of Mitigation Measures **SMM WF-1** through **SMM WF-3** and Project-Level Mitigation Measures **PMM WF-2** and **PMM HAZ-4** would reduce the level of impacts; however, the impacts would remain significant and unavoidable.

The SCAG Regional Council finds that the areas with dry vegetation have the potential to exacerbate wildfire risk due to future development activities that could generate flammable debris piles. Future roadway and development construction in such areas, while likely to be less in the future, may still occur, such development has the potential to result in significant impacts as a result of construction equipment generating sparks or oil spill and other combustible materials leading to the start and spread of wildfires. Therefore, the Plan would potentially result in the installation or maintenance of infrastructure that may exacerbate fire risks. Mitigation Measure **SMM WF-1**, **SMM WF-2**, **SMM AG-4** and **SMM BIO-3** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM WF-2** and **PMM HAZ-4** would reduce impacts related to infrastructure that may exacerbate fire risks, to the maximum extent feasible because it

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requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to infrastructure that may exacerbate fire risks, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See SMM-WF-1, SMM WF-2, SMM AG-4, and SMM BIO-3.

Project-Level Mitigation Measures

See PMM HAZ-4.

PMM WF-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 wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to
 - 1) Submit a fire protection plan including the designation of fire watch staff;
 - 2) Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities;
 - 3) Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and
 - 4) Designate trained fire watch staff during project construction to reduce risk of fire hazards.

Impact WF-4 Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes.

Finding:

Implementation of SCAG Mitigation Measures **SMM-WF-1, SMM WF-2, SMM HYD-3, SMM GEO-1 and SMM GEO-2** and Project-Level Mitigation Measures **PMM WF-1, PMM WF-2, PMM HYD-1 and PMM HAZ-4** will reduce impacts related to the exposure of people or structures to risks resulting from runoff, post-fire slope stability, or drainage changes, to the maximum extent practicable and feasible. The SCAG Regional Council finds that significant and unavoidable impacts will remain after mitigation.

Rationale:

The above finding is made based on the analysis included in Section 3.20, Wildfire, of the PEIR. Implementation of SCAG Mitigation Measures **SMM-WF-1, SMM WF-2, SMM HYD-3, SMM GEO-1 and SMM GEO-2** and Project-Level Mitigation Measures **PMM WF-1, PMM WF-2, PMM HYD-1 and PMM HAZ-4** would reduce the level of impacts; however, the impacts would remain significant and unavoidable.

The SCAG Regional Council finds that development of homes and infrastructure is anticipated to continue to occur in areas of the region that are subject to wildfire hazards, despite the Plan's strategies to add development to existing urban areas. Therefore, the Plan would potentially result in the exposure of people or structures to risks resulting from runoff, post-fire slope stability, or drainage changes. Mitigation Measure **SMM WF-1, SMM WF-2, SMM HYD-3, SMM GEO-1 and SMM GEO-2** would reduce project impacts to the maximum extent feasible within the authority of SCAG. The SCAG Regional Council further finds that Project-Level Mitigation Measures **PMM WF-1, PMM WF-2, PMM HYD-1 and PMM HAZ-4** would reduce impacts related to the exposure of people or structures to risks resulting from runoff, post-fire slope stability, or drainage changes, to the maximum extent feasible because it requires lead agencies to exercise their discretionary authority to adopt all applicable and feasible mitigation as required by CEQA. While mitigation may provide a reduction in impacts related to the exposure of people or structures to risks resulting from runoff, post-fire slope stability, or drainage changes, it is uncertain that that all future project-level impacts can be mitigated to a less than significant level.

Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. The SCAG Regional

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Council finds that the significant impact is acceptable due to the overriding considerations that support adoption of the Plan, discussed in the Statement of Overriding Considerations.

SCAG Mitigation Measures

See SMM-WF-1, SMM WF-2, SMM HYD-3, SMM GEO-1 and SMM GEO-2.

Project-Level Mitigation Measures

See PMM WF-1, PMM WF-2, PMM HYD-1 and PMM HAZ-4.

6.22 FINDINGS ON CUMULATIVE IMPACTS

In compliance with CEQA Guidelines Section 15130, the PEIR evaluates the cumulative impacts of the Connect SoCal Plan. CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” (CEQA Guidelines Section 15355). Thus, if the effects of the Plan, in combination with the effects of past, present, and reasonably foreseeable future related projects within the region will be significant, the Plan’s incremental effects must be analyzed to determine if the Plan’s contribution to the cumulative impact is cumulatively considerable. (CEQA Guidelines Section 15065(a)(3)). Supportive evidence for the below findings may be found in the “Cumulative Effects” sections of each resource topic analysis in Draft PEIR Chapter 4.

6.22.1 Cumulative Effects Determined to be Significant for which the Contribution of the Plan would be Cumulatively Considerable even with Implementation of Mitigation Measures

Based on the analysis set forth in the PEIR, SCAG finds that the cumulative impacts of the Plan, in combination with the effects of past, present, and reasonably foreseeable future related projects within the region, would be significant. SCAG further finds that the Plan’s contribution to the following significant cumulative impacts would remain cumulatively considerable even with implementation of the mitigation measures set forth in the PEIR, and thus would be significant and unavoidable.

Aesthetics

Connect SoCal includes transportation projects and land use strategies that would shape the region over the next 25 years. As discussed in Section 3.1, Aesthetics, these changes include the extension of transportation and related infrastructure and expansion of urbanized areas that would impact scenic resources. Transportation projects could facilitate access not only within SCAG boundaries but also to areas

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outside the region. In addition, Plan projects would connect with projects outside the region facilitating and potentially inducing construction of transportation infrastructure and development outside the region. Some of these changes would be expected on the fringe of the region (e.g. projects along the border of Los Angeles and Kern Counties). Urbanization or loss of these visual resources could also affect areas outside the region as many of these scenic areas extend beyond SCAG borders. As a result, the Plan could indirectly cause changes to the visual character or to scenic areas outside the region. Therefore, the Plan would contribute to cumulative impacts to scenic resources and visual character. Implementation of Mitigation Measures **SMM AES-1** and **PMM AES-1** through **PMM AES-2** would reduce potential impacts to aesthetic resources. However, even with the implementation of mitigation measures, impacts are considered significant and could add to such impacts from cumulative projects (for example other RTPs for surrounding jurisdictions) outside the region.

Findings and Rationale

SCAG finds Mitigation Measure **SMM AES-1** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measures **PMM AES-1** and **PMM AES-2** are within the responsibility and jurisdiction of local lead agencies, which can and should adopt them. The mitigation activities identified in **PMM AES-1** through **PMM AES-2** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of local lead agencies.

SCAG finds while project-specific mitigation may reduce impacts to aesthetic resources, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM AES-1**, **PMM AES-1** through **PMM AES-2** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce this impact to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Agriculture and Forestry

Under the Connect SoCal Plan, consumption of farmland is anticipated. These impacts would be the direct result of either implementation of transportation projects or development anticipated to occur due to projected growth under the Plan. As discussed in Section 3.2, Agriculture and Forestry Resources, impacts to agricultural and forestry resources from the Plan are considered significant and unavoidable. Loss of farmland would worsen the conversion of agricultural lands due to urbanization throughout the state. The 2015 California Farmland Conversion Report ranks the Southern California region at the top in net acres converted to urban land, with Riverside County ranked second at the county level.⁸ The Southern California and San Joaquin Valley regions accounted for the largest urban growth in terms of acreage.⁹ Implementation of Mitigation Measures **SMM AG-1** through **SMM AG-4** and **PMM AG-1** would reduce impacts, but as other California regions continue to urbanize, agricultural land in the state may continue to be lost due to land use conversion, contributing to cumulative statewide significant impacts.

The Plan has the potential to conflict with Williamson Act lands or existing zoning for agricultural use. Mitigation Measures **SMM AG-1** through **SMM AG-2** and **PMM AG-1** through **PMM AG-2** would reduce impacts, but they are still considered significant. As noted above, through the increasing urbanization, other regions adjacent to SCAG boundaries may also convert agricultural lands to urban uses and conflict with existing zoning.

The Plan would have a significant impact regarding forest lands. Transportation projects included in the Plan that would result impact to forest lands include highway expansion, highway widening projects, and potential connectors. Projects in adjacent regions could convert forestry resources and forest lands due to development, resulting in cumulative impacts.

The Plan would involve other changes in the environment which, due to their location or nature, could convert Farmland to non-agricultural use or conversion of forest land to non-forest use. Implementation of Mitigation Measures **SMM AG-1** through **SMM AG-2** as well as **SMM GHG-1** through **SMM GHG-5** and **PMM AG-2** as well as **PMM GHG-2** would reduce impacts, but they are still considered significant. As development pressure from conversion of Farmland to urban uses increases, lands adjacent to SCAG boundaries may feel the same indirect pressure to develop and convert lands. Therefore, there would be a significant cumulative impact.

⁸ California Department of Conservation. 2015. *California Farmland Conversion Report 2015*. Available at: https://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp/pubs/2010-2012/FCR/FCR%202015_complete.pdf, accessed November 5, 2019.

⁹ Ibid.

Findings and Rationale

Mitigation Measures **SMM AG-1** through **SMM AG-2** and **SMM GHG-1** through **SMM GHG-5** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that **PMM AG-1** through **PMM AG-2**; **PMM AG-2**; and **PMM GHG-2** are primarily within the responsibility and jurisdiction local lead agencies, which can and should adopt them. These identified mitigation measures would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts to farmland and forest land, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, the mitigation measures identified above would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce this impact to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Air Quality

Connect SoCal is a regional plan that integrates transportation investments with land use strategies for the SCAG region. As such, the analysis of air quality impacts presented is inherently cumulative. As discussed in Section 3.3, Air Quality, the Plan would result in significant impacts as a result of short-term emissions of criteria pollutants and as a result of sensitive receptors being in proximity to sources of TACs (**Impact AQ-4**). However, the Plan could also contribute to air quality impacts outside the SCAG region itself. The cumulative analysis impact area for air quality consists of air basins that extend beyond the SCAG boundaries, such as the Mojave Desert Air Basin that extends into Kern County. Implementation of the Connect SoCal Plan combined with cumulative development outside of the SCAG region would add to the significant air quality impacts of the Plan.

Implementation of Mitigation Measures **SMM AQ-1** through **SMM AQ-3** and **PMM AQ-1** through **PMM AQ-3** would reduce the contribution to cumulative air quality impacts; however, the Plan's impacts would remain significant and would add to the impacts of other RTPs in surrounding jurisdictions.

Findings and Rationale

Mitigation Measures **SMM AQ-1** through **SMM AQ-3** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that and **PMM AQ-1** through **PMM AQ-3** are within the responsibility and jurisdiction of local lead agencies, which can and should adopt them. The mitigation activities identified in Mitigation Measures **PMM AQ-1** through **PMM AQ-3** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

While project-specific mitigation may reduce impacts to air quality, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM AQ-1** through **SMM AQ-3** and **PMM AQ-1** through **PMM AQ-3** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Biological Resources

As discussed in Section 3.4, Biological Resources, Connect SoCal would result in impacts to sensitive species as well as habitat fragmentation and loss and disturbance. Implementation of Mitigation Measures **SMM BIO-1** through **SMM BIO-2** and **PMM BIO-1** through **PMM BIO-6** would reduce impacts to biological resources but impacts would remain significant. Many of these impacts would be the direct result of either transportation improvements or development. Impacts to sensitive species, as well as loss of habitat and habitat fragmentation would contribute to similar statewide impacts. Many important habitat corridors cross the SCAG region's boundaries. As a result, the loss of an important corridor, or fragmentation of habitat could limit the movement of wildlife species resulting in additional cumulative impacts. Similarly, fragmentation could reduce the viability of a species beyond the plan area. Therefore, the significant impacts to biological resources anticipated to result from transportation and development projects occurring under the Plan would contribute to cumulative biological resources impacts outside of just the SCAG region, including effects throughout California.

Findings and Rationale

Mitigation Measures **SMM BIO-1** through **SMM BIO-2** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measures **PMM BIO-1** through **PMM BIO-6** are within the responsibility and jurisdiction of local lead agencies, which can and should adopt them. The mitigation activities identified in these measures would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts to farmland and forest land, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM BIO-1** through **SMM BIO-2** and **PMM BIO-1** through **PMM BIO-6** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Cultural Resources

The Plan includes transportation projects and land use strategies that will shape the region over the next 25 years. As discussed in Section 3.5, Cultural Resources, these changes include the extension of transportation and related infrastructure that would impact cultural resources through activities such as demolition of historical resources or indirect impacts such as changing the historic context of the resource. In addition, Plan projects will connect with projects outside the region, thereby facilitating and potentially inducing construction of transportation infrastructure outside the region. This additional infrastructure could lead to additional development, both inside and outside the region. Plan impacts would add to cultural resource impacts of cumulative projects (transportation projects and development in accordance with RTP plans of adjacent jurisdictions). Implementation of Mitigation Measures **SMM CULT-1** and **PMM CULT-1** and **PMM CULT-2**, would reduce the contribution to cumulative impacts to cultural resources. However, the Plan would still result in significant impacts to historical resources as well as archaeological resources and would contribute to significant cumulative impacts. Although in general cultural and

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historical impacts are specific to a smaller area (region), there is the potential for the project to contribute to impacts in adjacent counties.

Findings and Rationale

Mitigation Measure **SMM CULT-1** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measures **PMM CULT-1** and **PMM CULT-2** are within the responsibility and jurisdiction of local lead agencies, which can and should adopt them. The mitigation activities identified in Mitigation Measures **PMM CULT-1** and **PMM CULT-2** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM CULT-1** and **PMM CULT-1** and **PMM CULT-2** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Geology and Soils

Impacts to geology and soils related to implementation of the Plan are analyzed in Section 3.7, Geology and Soils. The Plan's ground disturbing activities would potentially impact paleontological resources. Ground-disturbing activities such as excavation for building foundations and bridges, trenching for utility lines, tunneling, and grading, could damage or destroy sensitive paleontological resources on or near the surface or at depth. Implementation of Mitigation Measures **SMM-GEO-3** and **PMM-GEO-1** would reduce the level of impacts but would still be considered significant. Paleontological resources, and important paleontological finds may still occur. For example, in 2005 a Mammoth was discovered in the City of Moorpark. The fossils were dated as between 400,000 and 1.8 million years old. Such finds, while locally

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important, provide important contextual information to the state's history and beyond. The loss of such resources would be cumulatively considerable.

Findings and Rationale

Mitigation Measure **SMM-GEO-3** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measure **PMM-GEO-1** is within the responsibility and jurisdiction of local lead agencies, which can and should adopt it. The mitigation activities identified in Mitigation Measure **PMM-GEO-1** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM-GEO-3** and **PMM-GEO-1** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Hazards and Hazardous Materials

Impacts associated with hazards and hazardous materials related to implementation of the proposed Plan are analyzed in Section 3.9, Hazards and Hazardous Materials. Hazards and hazardous materials impacts may be related to the transport, use, or disposal of hazardous materials, create a significant hazard through upset or accident conditions involving release of hazardous materials, hazardous materials within one-quarter mile of an existing or proposed school, location on a known hazardous materials site, airport-related hazards, and conflict with an emergency response plan. These effects occur independently of one another, related to site-specific and project-specific characteristics and conditions. However, the analysis in **Section 3.9** concluded there would be significant and unavoidable effects regarding impacts to transport of hazardous materials, release of hazardous materials, hazardous materials within one-quarter mile of a school, location on a known hazardous materials site, and conflict with an emergency response plan.

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Implementation of Mitigation Measures **SMM HAZ-1** through **SMM HAZ-5** as well as **SMM TRA-5** and **PMM HAZ-1** through **PMM HAZ-1** through **PMM HAZ-5** as well as **PMM TRA-5** would reduce the Plan's impacts, but they would remain significant. These impacts have the potential, due to transportation projects and land use strategies, to have effects beyond SCAG boundaries, particularly to adjacent jurisdictions. Therefore, implementation of the Plan would have significant cumulative impacts.

Findings and Rationale

Mitigation Measures **SMM HAZ-1** through **SMM HAZ-5** as well as **SMM TRA-5** and **PMM HAZ-1** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measures **PMM HAZ-1** through **PMM HAZ-5** as well as **PMM TRA-5** are within the responsibility and jurisdiction of local lead agencies, which can and should adopt them. The mitigation activities identified in Mitigation Measures **PMM HAZ-1** through **PMM HAZ-5** as well as **PMM TRA-5** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM HAZ-1** through **SMM HAZ-5** as well as **SMM TRA-5** and **PMM HAZ-1** through **PMM HAZ-1** through **PMM HAZ-5** as well as **PMM TRA-5** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Hydrology and Water Quality

As discussed in **Section 3.10, Hydrology and Water Quality**, the Plan would result in significant impacts related to water quality, groundwater recharge, flood hazards and water supply. The land use strategies included in the Plan would result in a more compact development pattern that would be more water efficient. The water providers within the SCAG region that serve the population would need to coordinate water supply with nearby jurisdictions. Given the unreliability of water supply in the region, the increase

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of approximately 3.2 million people would result in a significant impact to water supply that would add to the impacts of development in surrounding jurisdictions. The Plan could also facilitate access to other areas of the state by increasing infrastructure which could ultimately influence growth (and associated impermeable surfaces) in areas outside SCAG boundaries. Mitigation Measures **SMM HYD-1** through **SMM HYD-2** and **PMM HYD-1** through **PMM HYD-2** would reduce impacts, but they would remain significant. This could result in greater impacts to water quality and could affect water in areas outside the SCAG region. Therefore, the Plan would result in significant cumulative impacts.

Findings and Rationale

Mitigation Measures **SMM HYD-1** through **SMM HYD-2** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measures **PMM HYD-1** through **PMM HYD-2** are within the responsibility and jurisdiction of local lead agencies, which can and should adopt them. The mitigation activities identified in Mitigation Measures **PMM HYD-1** and **PMM HYD-2** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM HYD-1** through **SMM HYD-2** and **PMM HYD-1** through **PMM HYD-2** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Land Use and Planning

As discussed in Section 3.11, Land Use and Planning, implementation of the Connect SoCal Plan has the potential to physically divide an established community and to conflict with existing land use plans. The Plan would result in an increase in density and land use development. Improved accessibility from the Plan could help facilitate urbanization to areas outside the region. Furthermore, changes in land use patterns in the region (i.e. increased urbanization) could affect areas outside the region, resulting in

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increased urbanization in adjacent jurisdictions. Implementation of Mitigation Measures **SMM LU-1** through **SMM LU-4** and **PMM LU-1** through **PMM LU-2** would reduce impacts, but they would remain significant. Therefore, the Plan would result in significant cumulative land use impacts.

Findings and Rationale

Mitigation Measures **SMM LU-1** through **SMM LU-4** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measures **PMM LU-1** and **PMM LU-2** are within the responsibility and jurisdiction of local lead agencies, which can and should adopt them. The mitigation activities identified in Mitigation Measures **PMM LU-1** and **PMM LU-2** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM LU-1** through **SMM LU-4** and **PMM LU-1** through **PMM LU-2** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Mineral Resources

Impacts to mineral resources related to implementation of the Plan are analyzed in Section 3.12, Mineral Resources. The analysis concluded that there would be a significant and unavoidable impact regarding the loss of known mineral resources occurring from transportation projects and land use strategies in the Plan. Aggregate resources used in construction activities throughout the SCAG region would potentially be reduced due to the Plan's transportation projects and anticipated development under the Plan. The Plan could worsen depletion of aggregate supply which would impact surrounding areas and the state. Mitigation Measures **SMM MIN-1** and **PMM MIN-1** would reduce impacts, but they would remain

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significant. Therefore, the Plan would have significant cumulative impact on mineral resources adding to the impact from development of areas outside the SCAG region.

Findings and Rationale

Mitigation Measure **SMM MIN-1** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measure **PMM MIN-1** is within the responsibility and jurisdiction of local lead agencies, which can and should adopt it. The mitigation activities identified in Mitigation Measure **PMM MIN-1** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM MIN-1** and **PMM MIN-1** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Noise

As discussed in Section 3.13, Noise, the Plan would result in significant impacts related to increases in noise. Changes resulting from the Plan include the extension of transportation and related infrastructure that would result in new noise sources as well as increased noise from some existing sources. Implementation of Mitigation Measures **SMM NOISE-1** and **PMM NOISE-1** would reduce noise and vibration impacts, however they would remain significant. Many of the transportation projects could facilitate access not only within SCAG boundaries but also areas outside the region to adjacent jurisdictions. In addition, Plan projects will connect with projects outside the region, facilitating and potentially inducing construction of transportation infrastructure outside the region. Construction noise and vibration impacts are generally site specific, but to the extent that the Plan might influence growth outside the region, it could result in construction noise outside the region. As population in the region continues to increase, the Plan could also contribute to a cumulatively considerable temporary or permanent increase in noise and

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vibration outside the region as a result of increased travel. This activity would include railroads, as well as freeway, arterial and transit noise. As a result, there would be a significant cumulative impact.

Findings and Rationale

Mitigation Measure **SMM NOISE-1** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measure **PMM NOISE-1** is within the responsibility and jurisdiction of local lead agencies, which can and should adopt it. The mitigation activities identified in Mitigation Measure **PMM NOISE-1** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM NOISE-1** and **PMM NOISE-1** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Population and Housing

As discussed in Section 3.14, Population and Housing, implementation of the Connect SoCal Plan could facilitate an increase in population, housing, and employment (although the same increases are anticipated whether or not the Plan is adopted). It is possible that the improved accessibility gained by transportation investments and key land use strategies could result in an increase in population in areas outside the region (as people find it easier to move from outside the region to employment centers within the region). If population increases in areas outside the SCAG region were in excess of forecasts and plans, it could add to cumulative impacts in other jurisdictions. Impacts would be reduced by Mitigation Measures **SMM POP-1** through **SMM POP-4** and **PMM POP-1** would reduce impacts, but they would remain significant. Therefore, the significant impacts of the Plan could contribute to population and displacement impacts of other Plans in neighboring jurisdictions, resulting in a significant cumulative impact.

Findings and Rationale

Mitigation Measures **SMM POP-1** through **SMM POP-4** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measure **PMM POP-1** is within the responsibility and jurisdiction of local lead agencies, which can and should adopt it. The mitigation activities identified in Mitigation Measure **PMM POP-1** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM POP-1 through SMM POP-4** and **PMM POP-1** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Public Services

Fire Protection

As discussed in Section 3.15.1, Fire Protection, the Plan would result in significant impacts related to the need for new facilities, the construction of which could cause physical impacts. In general impacts to fire services would be confined to the region and would result from transportation projects and anticipated growth. It is possible that developments that occur near the region's boundary could result in the need for new or expanded fire protection facilities outside the region. This impact would be cumulatively considerable. In addition, wildfire impacts would be significant. Large fires can extend across regional boundaries requiring firefighters from adjacent regions and beyond to assist on a case-by-case basis. To the extent that the Plan would increase urban uses along the wildland interface and increase fire risk, the chance of a fire requiring multi-regional support also increases. Implementation of Mitigation Measures **SMM PSF-1** through **SMM PSF-2** and **PMM PSP-1** would reduce potential impacts to fire protection.

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However, even with the implementation of mitigation measures, impacts are considered significant and could add to such impacts from cumulative projects outside the region.

Findings and Rationale

SCAG finds Mitigation Measure **SMM PSF-1** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measure **PMM PSP-1** is within the responsibility and jurisdiction of local lead agencies, which can and should adopt it. SCAG finds mitigation activity identified in Mitigation Measure **PMM PSP-1** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of local lead agencies.

SCAG finds while project-specific mitigation may reduce impacts to fire protection, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM PSF-1** and **SMM PSF-2, and PMM PSP-1** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce this impact to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Police Protection

As discussed in Section 3.15.2, Police Protection, the Plan would result in significant impacts related to the need for new facilities. Impacts would be reduced by Mitigation Measures **SMM PSP-1** through **SMM PSP-4** and **PMM PSP-1** would reduce impacts, but they would remain significant. In general, impacts as a result of construction of new police facilities would be confined to the immediate area of the construction of each facility. However, as with fire protection, where development and transportation projects are located on the boundary of the region, it is possible that new or expanded facilities would be necessary outside the region. If the construction of such facilities results in a significant impact, the Plan's impact would be cumulatively considerable.

Findings and Rationale

Mitigation Measures **SMM PSP-1** through **SMM PSP-4** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG find that Mitigation Measure **PMM PSP-1** is within the responsibility and jurisdiction of local lead agencies, which can and should adopt it. The mitigation activities identified in **PMM PSP-1** would require the exercise of discretionary authority to implement project specific mitigation that is wholly within the responsibility of local lead agencies.

SCAG finds while project-specific mitigation may reduce impacts to police protection, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM PSP-1** through **SMM PSP-4** and **PMM PSP-1** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce this impact to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Schools

As discussed in Section 3.15.3, Schools, the Plan would result in significant impacts related to the need for new school facilities. Mitigation Measure **SMM PSS-1** and **PMM PPS-1** would reduce impacts, but they would remain significant. In general, impacts as a result of construction of new schools would be confined to the immediate area of each school. However, if development and transportation projects occur on the boundary of the region, it is possible that new or expanded school facilities would be necessary. If the construction of such facilities results in significant impacts, the Plan's impact would be cumulatively considerable.

Findings and Rationale

SCAG finds Mitigation Measure **SMM PSS-1** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measure **PMM PSS-1** is within the responsibility and jurisdiction of local lead agencies, which can and should adopt it. The mitigation activity identified in Mitigation Measure **PMM PSS-1** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of local lead agencies.

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SCAG finds while project-specific mitigation may reduce impacts to school, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM PSS-1** and **PMM PSS-1** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce this impact to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Library Services

As discussed in Section 3.15.4, the Plan would result in significant impacts related to the need for new facilities. Mitigation Measure **PMM PSL-1** would reduce impacts, but they would remain significant. In general, impacts as a result of construction of new library facilities would be confined to the immediate area of each library. However, if development and transportation projects occur on the boundary of the region, it is possible that new or expanded library facilities would be necessary. If the construction of such facilities results in significant impacts, the Plan's impact would be cumulatively considerable.

Findings and Rationale

SCAG finds **Mitigation Measure SMM PSL-1** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG find that Mitigation Measure **PMM PSL-1** is within the responsibility and jurisdiction of local lead agencies, which can and should adopt it. The mitigation activity identified in Mitigation Measure **PMM PSL-1** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of local lead agencies.

SCAG finds while project-specific mitigation may reduce impacts to school, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM PSL-1** and **PMM PSL-1** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce this impact to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain

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mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Parks and Recreation

To the extent that development may occur on the periphery of the SCAG region, it could increase demand for recreation facilities in surrounding jurisdictions as discussed in Section 3.16, Parks and Recreation. Similarly, development on the periphery of these other regions, such as adjacent counties, would result in demand for recreational facilities within the SCAG region. In addition, given the natural resources in the SCAG region, any development in other counties would tend to increase demand for recreation facilities with statewide appeal that are within the SCAG region. Improved transportation infrastructure would facilitate access to these recreational facilities. Impacts would be reduced by Mitigation Measures **SMM REC-1** and **PMM REC-1, PMM AQ-2(b), and PMM NOISE-1(b)** but would remain significant. Therefore, the significant impacts of the Plan on existing facilities of statewide appeal would add to similar impacts anticipated to result from RTPs in other jurisdictions, resulting in a significant cumulative impact.

Findings and Rationale

SCAG finds Mitigation Measure **SMM REC-1** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measures **PMM REC-1, PMM AQ-2,** and **PMM NOISE-1** are within the responsibility and jurisdiction of local lead agencies, which can and should adopt them. The mitigation activities identified in, **PMM REC-1, PMM AQ-2,** and **PMM NOISE-1** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM REC-1, PMM REC-1, PMM AQ-2,** and **PMM NOISE-1** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact

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remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Transportation, Traffic, and Safety

As discussed in Section 3.17, Transportation, Traffic and Safety, the Plan would result in increases in total VMT and vehicle hours of delay but reductions in per capita VMT and vehicle hours of delay. Implementation of the Connect SoCal Plan would result in an increase in density and land use development over the life of the Plan. Transportation and traffic related impacts would be reduced by Mitigation Measures **SMM TRA-1** through **SMM TRA-8** and **PMM TRA-1** through **PMM TRA-2** but they would remain significant. Implementation of the Plan, combined with growth outside the region, has the potential to conflict with congestion management programs outside SCAG boundaries. Congestion and delay from RTPs in adjacent counties would add to these significant impacts, which would result in a significant cumulative impact. Further, as discussed in Section 3.17 Transportation, the per capita VMT reductions may not be enough to meet the state goals established by CARB. This, combined with other MPO's not achieving reductions in VMT beyond those identified by CARB, would result in a cumulative statewide impact.

Findings and Rationale

SCAG finds Mitigation Measures **SMM TRA-1** through **SMM TRA-8** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measures **PMM-TRA-1** and **PMM-TRA-2** are within the responsibility and jurisdiction of local lead agencies, which can and should adopt them. The mitigation activities identified in Mitigation Measures and **PMM TRA-1** through **PMM TRA-2** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM TRA-1** through **SMM TRA-8** and **PMM TRA-1** through **PMM TRA-2** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation

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measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Tribal Cultural Resources

Plan projects will facilitate access to areas outside the region. In addition, Plan projects will connect with projects outside the region, thereby facilitating and potentially inducing construction of transportation infrastructure outside SCAG boundaries. As discussed in Section 3.18, implementation of the Plan would result in significant impacts to tribal cultural resources. Mitigation Measures **SMM TCR-1** and **PMM TCR-1** would reduce impacts but they would remain significant. Therefore, the impacts would contribute to significant cumulative impacts to tribal cultural resources throughout the state as resources are impacted by new development and land is disturbed.

Findings and Rationale

SCAG finds that Mitigation Measure **SMM TRC-1** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measure **PMM-TRA-1** is within the responsibility and jurisdiction of local lead agencies, which can and should adopt it. The mitigation activities identified in Mitigation Measure **PMM TRC-1** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM TRC-1** and **PMM TRC-1** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Utilities and Service Systems

Solid Waste

The Plan would result in significant impacts related to solid waste generation in the region, as discussed in Section 3.19.1, Solid Waste. Implementation of Mitigation Measures **SMM USSW-1** through **SMM USSW-2** and **PMM USSW-1** would reduce impacts but they would remain significant. As population increases across the state, it is expected that additional demands will be placed on landfills with remaining capacity both from inside the SCAG region and from nearby areas such as adjacent counties. The increased demand on landfill capacity could result in the need to truck waste long distances, including to sites outside the region which could result in localized impacts outside the region (noise, air quality, traffic). Further, landfill capacity is finite and by reducing landfill capacity outside the region, there would be less capacity available for areas outside the region. As a result, the Plan would add to impacts on available landfill capacity and result in a cumulatively considerable impact.

Findings and Rationale

SCAG finds Mitigation Measures **SMM-USSW-1** through **SMM-USSW-2** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measure **PMM USSW-1** is within the responsibility and jurisdiction of local lead agencies, which can and should adopt it. The mitigation activities identified in Mitigation Measure **PMM USSW-1** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measure **SMM-USSW-1** through **SMM-USSW-2** and **PMM USSW-1** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Wastewater

The Plan would result in a significant impact related to wastewater capacity and the need for new facilities, as discussed in Section 3.19.2, Wastewater. Impacts would be reduced by Mitigation Measures **SMM HYD-1** through **SMM HYD-3** and **SMM USWW-1** and **PMM USWW-1** but impacts would remain significant. Connect SoCal includes transportation projects and regional land use strategies, targeting growth in urban areas. However, due to planned transportation projects and anticipated development, there would be potential for construction of new stormwater drainage facilities or expansion of existing facilities would be needed. The need for new or expanded facilities for Plan projects in combination with other large projects outside the region, such as wastewater projects in adjacent counties or transportation projects that connect with projects to outside areas could result in significant impacts. As such the Plan would result in a cumulatively considerable impact.

Findings and Rationale

SCAG finds Mitigation Measures **SMM HYD-1** through **SMM HYD-3** and **SMM USWW-1** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measure **PMM USWW-1** is within the responsibility and jurisdiction of local lead agencies, which can and should adopt it. The mitigation activities identified in Mitigation Measures **PMM USWW-1** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG finds while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measure **SMM HYD-1** through **SMM HYD-3** and **SMM USWW-1** and **PMM USWW-1** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Water Supply

The Plan would result in significant impacts related to water supply, as discussed in Section 3.19.3, Water Supply. Impacts would be reduced by Mitigation Measures **SMM USWS-1** and **PMM USWS-1** but impacts would remain significant. The water providers within the SCAG region that serve the population would need to coordinate water supply with nearby jurisdictions. Given the unreliability of water supply in the region, additional population growth would result in a significant impact to water supply that would add to the impacts of development in surrounding jurisdictions. Water supply projects that serve the SCAG region include infrastructure that extends beyond the boundaries of the SCAG region. For example, the California Aqueduct conveys water from the Sierra Nevada Mountains and the Colorado River Aqueduct conveys water from the Colorado River to Southern California. Increases in population could require or result in the relocation or construction of new or expanded water facilities outside of the region. As such, the Plan would result in a cumulatively considerable impact.

Findings and Rationale

SCAG finds Mitigation Measure **SMM USWS-1** would reduce cumulative impacts to the maximum extent feasible within the authority of SCAG. SCAG finds that Mitigation Measure **PMM USWS-1** is within the responsibility and jurisdiction of local lead agencies, which can and should adopt it. The mitigation activities identified in Mitigation Measure **PMM USWS-1** would require the exercise of discretionary authority to implement project-specific mitigation that is wholly within the responsibility of other agencies.

SCAG while project-specific mitigation may reduce impacts, all project circumstances are not foreseeable and these mitigation measures may not be feasible or effective for some projects. Therefore, Mitigation Measures **SMM USWS-1** and **PMM USWS-1** would not necessarily eliminate all significant adverse impacts.

SCAG finds that no other mitigation measures or alternatives are feasible that would reduce cumulative impacts to less than significant levels. SCAG finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Since no feasible mitigation measures or alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable. Since no specific feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

6.22.2 Cumulative Impacts Determined to be Significant for which the Contribution of the Plan would not be Cumulatively Considerable

Energy

Impacts to energy related to implementation of the Plan are analyzed in Section 3.6, Energy. The increase in energy demand that is anticipated to occur as population increases in the SCAG region would contribute cumulatively to state increases in energy consumption. The state population is anticipated to continue to grow throughout the implementation period of the Connect SoCal Plan, reaching over 47 million by 2045.¹⁰ Inland areas within the state will grow at higher rates, as the Inland Empire, San Joaquin Valley, and the Sacramento region experience faster growth.¹¹ The population growth reflects California's increasing energy demand, with the lowest 2030 estimates indicating an annual consumption demand of 326,026 GWh.¹² Transportation energy demand will see significant changes in response to increasing vehicle electrification, higher vehicle fuel economy, and hydrogen fuel demand. Although California's population and economy are expected to grow, gasoline consumption is projected to decline by 2030.¹³ Diesel demand and demand for hydrogen fuel will continue to rise during same period.¹⁴ The various counties and cities within the SCAG region, in accordance with state law, will require the implementation a variety of energy efficiency measures to decrease energy consumption as a means to reduce GHG emissions. The Plan aims to reduce energy consumption and GHG emissions, and would comply with the state's goals, as adjacent counties' regional plans would also comply with state goals. Energy impacts would be less than significant. Therefore, the Plan would not cumulatively contribute to wasteful, inefficient, or unnecessary consumption of energy resources.

Findings and Rationale

The project would make a less than cumulatively considerable contribution to the significant cumulative public services impact from wasteful, inefficient, or unnecessary consumption of energy resources.

¹⁰ California Department of Finance. 2019. *Total Estimated and Projected Population for California and Counties: 1-Year Increments*. Available at: <http://www.dof.ca.gov/Forecasting/Demographics/Projections/>, accessed November 6, 2019.

¹¹ Public Policy Institute of California. 2016. *California's Future*. Available at: https://www.ppic.org/content/pubs/report/R_116HJ3R.pdf, accessed November 6, 2019.

¹² California Energy Commission. 2018. *California Energy Demand 2018-2030 Revised Forecast*. Available at: https://ww2.energy.ca.gov/2017_energy_policy/documents/, accessed November 6, 2019.

¹³ California Energy Commission. 2017. *Transportation Energy Demand Forecast, 2018-2030*.

¹⁴ Ibid.

Geology and Soils

Impacts to geology and soils related to implementation of the Plan are analyzed in **Section 3.7, Geology and Soils**. The SCAG region extends primarily over four California geomorphic provinces: the Mojave Desert, the Transverse Ranges, the Peninsular Ranges, and the Colorado Desert.¹⁵ These geomorphic provinces include several active faults, and they extend beyond SCAG's boundaries to neighboring counties. However, geologic effects occur independently of one another and are related to site-specific and project-specific characteristics and conditions. In addition, existing regulations specify mandatory actions that must occur during project development, which would adequately address the potential for effects from construction or operation of projects related to exposure to seismic hazards. Since the implementation of the Plan would not exacerbate existing geologic hazards including fault rupture, in addition to the fact that there are already numerous regulations in place to reduce such risks to any planned development or transportation project, geologic impacts would be less than significant and the Plan would not result in a considerable contribution to cumulative impacts.

Findings and Rationale

The project would make a less than cumulatively considerable contribution to impacts to existing geologic hazards.

¹⁵ California Geological Survey. 2002. *California Geomorphic Provinces*. Available online at: https://www.conservation.ca.gov/cgs/Documents/Note_36.pdf, accessed June 12, 2019.

7.0 FINDINGS REGARDING ALTERNATIVES

7.1 BACKGROUND

CEQA requires that an EIR describe a reasonable range of alternatives to the project or to the location of the project that could feasibly avoid or lessen significant environmental impacts while substantially attaining the basic objectives of the project. An EIR should also evaluate the comparative merits of the alternatives. This chapter sets forth potential alternatives to the proposed project and provides a qualitative analysis of each alternative and a comparison of each alternative to the proposed project. Key provisions of the CEQA Guidelines pertaining to the alternatives analysis are summarized below.

- The discussion of alternatives shall focus on alternatives to the project including alternative locations 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.
- The No Project Alternative shall be evaluated along with its potential impacts. The No Project Alternative analysis shall discuss the existing conditions at the time the notice of preparation is published, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- 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.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects can be reasonably ascertained and whose implementation is remote and speculative.

7.2 PROJECT OBJECTIVES AND LEGAL REQUIREMENTS

At the time of project approval, the lead agency's decision-making body must determine whether the alternatives are feasible or not -- a task it cannot delegate (see *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998-1000; and CEQA Guidelines §§ 15025(b)(2), 15091(a)(3)). The lead agency must consider whether specific "economic, legal, social, technological, and other considerations . . .

make infeasible mitigation measures or alternatives identified in the environmental impact report" (Pub. Res. Code, § 21081(a)(3); CEQA Guidelines § 15091(a)(3)).

"Feasible" means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors" (CEQA Guidelines § 15364; see also CEQA Guidelines § 15021(b)). The concept of "feasibility" under CEQA also encompasses "desirability" to the extent that desirability is based on a reasonable balancing of all relevant factors (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417). Additionally, "policy considerations," may also be taken into account because they are "permissible" under CEQA as "other considerations" that make infeasible mitigation measures or alternatives identified in the EIR. (See *California Native Plant Society*, 177 Cal.App.4th at 1001 (An agency may reject project alternatives if found to be impracticable or undesirable from a policy standpoint.)) Finally, an alternative or measure is legally infeasible if "there is no way to legally implement it" (*Sequoyah Hills Homeowners Assn. v. City of Oakland*, 23 Cal.App.4th 704, 714 (1993)).

Importantly, CEQA gives lead agencies the authority to approve a project notwithstanding its significant environmental impacts, if the agency determines it is not "feasible" to lessen or avoid the significant effects. (Pub. Res. Code, § 21002). If specifically identified benefits of the project outweigh the significant unavoidable environmental impacts, the adverse impacts may be considered "acceptable," thereby allowing for lead agency approval of the project, notwithstanding such adverse impacts, provided the agency adopts a statement of overriding considerations (Pub. Res. Code, § 21081.1(b); CEQA Guidelines § 15093).

As called for by the CEQA Guidelines, the achievement of project objectives must be balanced by the ability of an alternative to reduce the significant impacts of the project. The proposed Connect SoCal Plan goals include:

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 critical habitats.

The proposed Connect SoCal Guiding principles include:

1. Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.
2. Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.
3. Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.
4. Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.
5. Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.
6. Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs and strategies.
7. Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.

CEQA does not require adoption of an alternative that does not adequately meet project objectives as determined by the lead agency decision-makers. A feasible alternative must meet most, if not all, of these project objectives. In addition, while not specifically required under CEQA, other parameters may be used to further establish criteria for selecting alternatives such as adjustments to phasing, and other “fine-tuning” that could shape feasible alternatives in a manner that could result in reducing identified environmental impacts.

The SCAG Regional Council finds that the Plan meets all of the above objectives and is feasible. With the exception of the No Project Alternative, the other alternatives considered herein meet some but not all of these objectives (the No Project Alternative does not meet any of the project objectives). SCAG has evaluated three alternatives: (1) No Project Alternative; (2) Existing Plans - Local Input Alternative; and (3) the Intensified Land Use Alternative, and determined that none of the alternatives were able to avoid the significant impacts associated with the Plan. The SCAG Regional Council further finds that the other alternatives are infeasible due to economic, legal, social, technological, and other considerations including policy considerations as discussed in more detail below.

Overview

Alternatives were analyzed in the PEIR for the SCAG Connect SoCal Plan consistent with the recommendations of Section 15126.6 of the CEQA Guidelines, which require evaluation of a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant project effects.

The analysis of alternatives is limited to those that SCAG has determined could feasibly attain most of the basic objectives of the Plan. Section 15126.6(f) of the CEQA Guidelines describes feasibility as being dependent on site suitability, economic viability, availability of infrastructure, general plan consistency, consistency with other plans or regulatory limitations, jurisdictional boundaries, and the ability of the project proponent to gain access to or acquire an alternative site. As a result of the analysis contained in the PEIR regarding the environmental, health, and social characteristics of the Project and alternatives, SCAG recommends approval of the Plan. Support for the Plan is directly responsive to the ability to attain all the objectives of the project and minimize significant impacts. Therefore, the Plan will meet all project objectives and reduce the identified significant environmental impacts to the maximum extent feasible.

The alternatives were identified during the Plan scenario planning development process as having the potential to avoid significant effects of the Plan. Section 15126.6(e) of the State CEQA Guidelines requires that a “No Project” Alternative must be evaluated. In addition to the No Project Alternative required to be considered pursuant to CEQA, this PEIR evaluates two other alternatives: Existing Plans - Local Input Alternative and the Intensified Land Use Alternative. Each of the three alternatives including the No Project Alternative, consists of a transportation network element and a land use pattern element, and is substantively aligned with the scenarios for developing the Plan.¹⁶ The No Project Alternative is based on

¹⁶ Southern California Association of Governments. Accessed 7 November 2015. 2016-2040 RTP/SCS Draft Scenario Planning Matrix. Available at: <http://www.scag.ca.gov/committees/CommitteeDocLibrary/oswgcg021915draftscenario.pdf>

and aligned with the Trend/Baseline Scenario and includes transportation projects that are in place at the time of preparation of the Connect SoCal Plan and that are included in the first two years of the previously conforming transportation plan and/or federal transportation improvement program (FTIP).

The effectiveness of each of the alternatives to achieve the basic objectives of the Plan has been evaluated in relation to the statement of goals and guiding principles. Although the No Project Alternative is not capable of meeting most of the goals of the Project, it has been analyzed, as required by CEQA.

The alternatives are evaluated at a comparative level of detail, consistent with the provisions of § 15126.6(d) of the *State CEQA Guidelines* (**Table B-3, Comparison of Connect SoCal and Alternatives**). Concentration of development to improve the transportation network and accommodated anticipated population growth are among the guiding principles for the Plan. Development of greenfields varies widely among the alternatives. At approximately 64,608 acres of greenfield land consumption, the No Project Alternative has the greatest anticipated conversion of greenfield, while Alternative 3: Intensified Land Use Alternative would reduce that development of greenfields to approximately 32,247 acres.

Table B-3
Comparison of Connect SoCal and Alternatives

Elements	Proposed Project: Connect SoCal	Alternative 1: No Project Alternative	Alternative 2: Existing Plans- Local Input Alternative	Alternative 3: Intensified Land Use Alternative
Greenfield Land Consumption	41,546 acres	64,608 acres	54,679 acres	32,247 acres
Natural Land	21,561,361 acres	21,559,568 acres	21,553,029 acres	21,563,157 acres
Agricultural Land (total)	892,477 acres	887,706 acres	882,069 acres	890,603 acres
Total Area Converted from Agriculture to Urban from the existing	6,732 acres	10,101 acres	14,861 acres	8,563 acres
Agriculture Production Value	\$3,561,365,881	\$3,543,507,241	\$3,522,366,445	\$3,556,648,245
Acres of Habitat Improved from the existing (Threatened and Endangered Species)	311 acres	29 acres	481 acres	126 acres
Acres of Habitat Improved from the existing (Species Vulnerable to Climate Change – Except Birds)	354 acres	44 acres	735 acres	220 acres
Acres of Habitat Improved from the existing (Species	1,525 acres	1,265 acres	3,125 acres	1,216 acres

7.0 Findings Regarding Alternatives

Elements	Proposed Project: Connect SoCal	Alternative 1: No Project Alternative	Alternative 2: Existing Plans- Local Input Alternative	Alternative 3: Intensified Land Use Alternative
Vulnerable to Climate Change - Birds)				
Acres of Habitat Degraded from the existing (Threatened and Endangered Species)	7,899 acres	8,365 acres	12,274 acres	7,115 acres
Acres of Habitat Degraded from the existing (Species Vulnerable to Climate Change – Except Birds)	9,621 acres	10,456 acres	14,967 acres	8,728 acres
Acres of Habitat Degraded from the existing (Species Vulnerable to Climate Change - Birds)	12,778 acres	15,231 acres	19,862 acres	11,666 acres
High Species Movement Potential	22,210,114 acres	22,211,576 acres	22,191,944 acres	22,211,104 acres
Total Carbon Stock	73,707,960 metric tons	73,726,660 metric tons	73,571,245 metric tons	73,809,796 metric tons
Total non-Transportation GHG Emissions (MMT), annual	34.2 MMT	35.0 MMT	34.7 MMT	34.2 MMT
Housing Mix	42% Multifamily 8% Townhome 23% Single Family small lot 27% Single Family large lot	37% Multifamily 7% Townhome 27% Single Family small lot 29% Single Family large lot	40% Multifamily 7% Townhome 25% Single Family small lot 28% Single Family large lot	44% Multifamily 8% Townhome 22% Single Family small lot 26% Single Family large lot
Development Location (Growth Priority Areas)	60% Homes 73% Jobs	58% Homes 70% Jobs	57% Homes 70% Jobs	60% Homes 73% Jobs
Land Pattern Focus (New Housing)	21% Urban (infill) 63% Compact (walkable) 16% Standard (suburban)	9% Urban (infill) 18% Compact (walkable) 73% Standard (suburban)	4% Urban (infill) 69% Compact (walkable) 27% Standard (suburban)	16% Urban (infill) 57% Compact (walkable) 27% Standard (suburban)
Land Pattern Focus (New Jobs)	23% Urban (infill) 62% Compact (walkable) 15% Standard (suburban)	8% Urban (infill) 9% Compact (walkable) 84% Standard (suburban)	4% Urban (infill) 61% Compact (walkable) 36% Standard (suburban)	20% Urban (infill) 52% Compact (walkable) 27% Standard (suburban)
Cumulative Residential and Commercial Building Energy Consumed and Energy Costs	15,464 trillion Btu \$670 billion	15,670 trillion Btu \$678 billion	15,592 trillion Btu \$675 billion	15,381 trillion Btu \$666 billion
Cumulative Residential and Commercial Building	84,676,019 acre-feet \$116 billion	85,689,515 acre-feet \$117 billion	85,215,252 acre-feet \$116 billion	85,038,413 acre-feet \$116 billion

Elements	Proposed Project: Connect SoCal	Alternative 1: No Project Alternative	Alternative 2: Existing Plans- Local Input Alternative	Alternative 3: Intensified Land Use Alternative
Water Use and Water Costs				
Per Household Total Cost (driving + utilities)	\$13,225	\$13,758	\$13,523	\$13,172
Infrastructure Capital	\$25.9 billion	\$28.6 billion	\$27.5 billion	\$26 billion
Operations and Maintenance	\$10.1 billion	\$ 11.3 billion	\$ 10.6 billion	\$ 10.0 billion
Highway Network	80,170 lane mile	74,862 lane mile	80,170 lane mile	80,170 lane mile
Transit Network (route mile)	14,906	14,485	14,824	14,906
Transit Boarding (daily)	5.1 million	3.1 million	4.7 million	5.1 million
Vehicle Miles Traveled (VMT) ¹	517,631,374 (total) 22.89 (VMT per capita)	538,091,045 (total) 23.80 (VMT per capita)	529,269,153 (total) 23.41 (VMT per capita)	516,259,271 (total) 22.83 (VMT per capita)
Vehicle Hours Traveled (VHT) ¹	14,130,874	15,424,699	14,539,787	14,074,675
Vehicle Hours Delay ¹	2,668,229 (total) 0.12 (Delay per capita)	3,470,645 (total) 0.15 (Delay per capita)	2,823,797 (total) 0.12 (Delay per capita)	2,619,980 (total) 0.12 (Delay per capita)

Note:

¹ This includes light and medium-duty vehicles, and heavy-duty trucks.

Source:

SCAG Modeling and SPM data, 2019.

Consistent with the requirements of § 15126.6(d) of the *State CEQA Guidelines*, the PEIR analysis provides information for the alternatives, including the No Project Alternative to allow meaningful evaluation, analysis, and comparison with the Project, inclusive of direct, indirect, and cumulative impacts (**Table B-4, Comparison of Alternatives to Connect SoCal**). The evaluation demonstrates if the alternative is able to avoid or reduce the significant and unavoidable effects of the Project.

Table B-4
Comparison of Alternatives to Connect SoCal

Environmental Issue	Connect SoCal Impact	Alternative 1 – No Project	Alternative 2 – Existing Plans - Local Input	Alternative 3- Intensified Land Use
Aesthetics				
Scenic Vistas	Significant	Less (significant)	Greater (significant)	Greater (significant)
Scenic Resources	Significant	Less (significant)	Greater (significant)	Greater (significant)
Visual Character	Significant	Greater (significant)	Greater (significant)	Less (significant)

7.0 Findings Regarding Alternatives

Environmental Issue	Connect SoCal Impact	Alternative 1 – No Project	Alternative 2 – Existing Plans - Local Input	Alternative 3- Intensified Land Use
Light and Glare	Significant	Greater (significant)	Greater (Significant)	Less (significant)
Agricultural Resources				
Convert Prime Farmland	Significant	Greater (significant)	Greater (significant)	Greater (significant)
Conflict with Williamson Act	Significant	Greater (significant)	Greater (significant)	Greater (significant)
Conflict with forest land zoning	Significant	Less (Less than significant)	Similar (Significant)	Similar (Significant)
Loss of forest land	Significant	Less (less than significant)	Similar (Significant)	Similar (Significant)
Other changes that result in loss of farmland or forest land	Significant	Greater (significant)	Greater(significant)	Similar (significant)
Air Quality				
Conflict with Air Quality Plans	Less than significant	Similar (less than significant)	Similar (less than significant)	Less (Less than significant)
Violate an air quality standard	Significant	Similar (significant)	Greater (significant)	Similar (significant)
Cumulatively considerable net increase in criteria pollutants	Significant	Greater (significant)	Greater (significant)	Less (significant)
Expose sensitive receptors	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Odor	Less than significant	Greater (less than significant)	Similar (less than significant)	Similar (less than significant)
Biological Resources				
Sensitive Species	Significant	Greater (significant)	Greater (significant)	Less (significant)
Riparian Habitat	Significant	Greater (significant)	Greater (significant)	Less (significant)
Wetlands	Significant	Greater (significant)	Greater (significant)	Less (significant)
Migratory Fish/Birds	Significant	Greater (significant)	Greater (significant)	Less (significant)
Tree Preservation	Significant	Greater (significant)	Greater (significant)	Less (significant)
Local Plans/HCPs	Significant	Greater (significant)	Greater (significant)	Less (significant)
Cultural Resources				
Historical Resources	Significant	Greater (significant)	Greater (significant)	Greater (significant)
Archeological Resources	Significant	Greater (significant)	Greater (significant)	Less (significant)
Disturb Human Remains	Significant	Similar (significant)	Greater (significant)	Less(significant)
Energy				
Wasteful and inefficient use of energy	Less than significant	Greater (less than significant)	Greater (less than significant)	Less (less than significant)
Conflict with or obstruct renewable energy plans	Less than significant	Similar (less than significant)	Similar (less than significant)	Less (less than significant)
Geology and Soils				
Fault rupture, ground shaking, ground failure/ liquefaction, landslides	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Soil Erosion	Significant	Greater (significant)	Greater (significant)	Less (significant)
Unstable Soil	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)

Environmental Issue	Connect SoCal Impact	Alternative 1 – No Project	Alternative 2 – Existing Plans - Local Input	Alternative 3- Intensified Land Use
Expansive Soil	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Septic Systems	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Paleontological Resources	Significant	Greater (significant)	Greater (significant)	Less (significant)
Greenhouse Gas Emissions				
Generate greenhouse gas emission	Significant	Greater (significant)	Greater (significant)	Less (significant)
Conflict with Plans	Significant	Greater (significant)	Greater (significant)	Similar (significant)
Hazards and Hazardous Materials				
Routine Transport	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Upset conditions	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Emissions within 0.25 mile of school	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Hazardous materials site	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Airport hazards	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Emergency response plan	Significant	Greater (significant)	Greater (significant)	Less (significant)
Hydrology and Water Quality				
Violate water quality standard	Significant	Greater (significant)	Greater (significant)	Less (significant)
Decrease groundwater	Significant	Greater (significant)	Greater (significant)	Less (significant)
Erosion or siltation	Significant	Greater (significant)	Greater (significant)	Less (significant)
Flooding	Significant	Greater (significant)	Greater (significant)	Less (significant)
Stormwater runoff	Significant	Greater (significant)	Greater (significant)	Less (significant)
Flood, seiche, tsunami	Significant	Greater (significant)	Greater (significant)	Less (significant)
Conflict with water quality control plan	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Land Use				
Physically divide a community	Significant	Less (significant)	Similar (significant)	Similar (significant)
Conflict with land use plans	Significant	Less (significant)	Similar (significant)	Greater (significant)
Mineral Resources				
Loss in availability of mineral resources	Significant	Less (significant)	Greater (significant)	Less (significant)
Loss of locally important mineral resources	Significant	Less (significant)	Greater (significant)	Less (significant)
Noise				
Temporary or permanent increase in noise levels in excess of established standards	Significant	Similar (significant)	Similar (significant)	Less (significant)
Groundborne vibration or noise	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Airport noise	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Population and Housing				

Environmental Issue	Connect SoCal Impact	Alternative 1 – No Project	Alternative 2 – Existing Plans - Local Input	Alternative 3- Intensified Land Use
Induce unplanned population growth	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Displace people or housing	Significant	Similar (significant)	Similar (significant)	Similar (significant)
Public Services				
Fire	Significant	Greater (significant)	Greater (significant)	Less (significant)
Police	Significant	Greater (significant)	Greater (significant)	Less (significant)
Schools	Significant	Similar (significant)	Similar (significant)	Less (significant)
Library	Significant	Similar (significant)	Similar (significant)	Less (significant)
Recreation				
Increase park use	Significant	Less (significant)	Less (significant)	Greater (significant)
Construction of new parks	Significant	Similar (significant)	Similar (significant)	Greater (significant)
Transportation and Traffic				
Conflict with program, plan, ordinance or policy addressing circulation system	Less than significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Conflict with CEQA Guidelines 15064.3(b)	Significant	Greater (significant)	Greater (significant)	Less (significant)
Increase hazards	Less than significant	Greater (less than significant)	Greater (less than significant)	Greater (less than significant)
Inadequate emergency access	Significant	Greater (significant)	Greater (significant)	Less (significant)
Tribal Cultural Resources				
Adverse change in a TCR	Significant	Greater (significant)	Greater (significant)	Less (significant)
Utilities – Solid Waste				
Generate excess solid waste or conflict with statutes	Significant	Greater (significant)	Similar (significant)	Similar (significant)
Utilities – Wastewater				
New or expanded wastewater treatment	Significant	Greater (significant)	Greater (significant)	Less (significant)
Exceed capacity	Significant	Greater (significant)	Greater (significant)	Greater (significant)
Utilities – Water Supply				
New or expanded water facilities	Significant	Greater (significant)	Greater (significant)	Less (significant)
Sufficient water supply	Significant	Greater (significant)	Greater (significant)	Less (significant)
Wildfire				
Impair adopted response plan	Significant	Greater (significant)	Greater (significant)	Less (significant)
Slope, prevailing winds may exacerbate wildfire risk	Significant	Greater (significant)	Greater (significant)	Less (significant)

Environmental Issue	Connect SoCal Impact	Alternative 1 – No Project	Alternative 2 – Existing Plans - Local Input	Alternative 3- Intensified Land Use
Installation or maintenance of infrastructure that may exacerbate fire risk	Significant	Greater (significant)	Greater (significant)	Less (significant)

Source: Impact Sciences 2019

7.3 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Description of Alternative

The No Project Alternative is required by Section 15126.6(e)(2) of the *CEQA Guidelines* and assumes that the Plan would not be implemented. The No Project Alternative allows decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The No Project Alternative evaluates “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (*CEQA Guidelines* Section 15126.6(e)(2)). The No Project Alternative is aligned with the Trend/Baseline Scenario¹⁷ and includes transportation projects that are in place at the time of preparation of the Connect SoCal Plan and that are included in the first two years of the previously conforming transportation plan and/or federal transportation improvement program (FTIP). “Exempt projects” include safety projects and certain mass transit projects, transportation control measures (“TCMs”) that are approved by the State Implementation Plan, and project phases that were authorized by the FHWA/FTA prior to expiration of SCAG’s conformity finding for the adopted 2016 RTP/SCS. These exempt projects would also be included in the No Project Alternative since they could move forward in the absence of an adopted Connect SoCal Plan.¹⁸

The land use strategies included in the No Project Alternative are based on the trending socioeconomic growth projection to the future (2045) updated with the same jurisdictional local input population, household and employment data as those in the Connect SoCal Plan to reflect the most recent local input growth estimates in the region.

¹⁷ Connect SoCal – Sustainable Communities Strategy Technical Report.

¹⁸ Federal Highway Administration. *Transportation Conformity: A Basic Guide for State and Local Officials (Revised 2010)*, FHWA-HEP-11-001. Available at: http://www.fhwa.dot.gov/environment/air_quality/conformity/guide/guide10.cfm

Effectiveness in Meeting Project Objectives

Although the No Project Alternative is not capable of meeting any of the goals of the Project, it has been analyzed, as required by CEQA.

Ability to Avoid or Substantially Lessen the Significant and Unavoidable Impacts of the Plan

The No Project Alternative does not avoid the significant and unavoidable impacts of the Plan, and in several instances the impacts would be more adverse due to the failure to achieve reductions in the consumptive use of land, energy, and water resources achieved through the policies and program embedded in the Plan that facilitate a more efficient use of these resources.

As set forth in detail in Section 4.0 of the PEIR, Alternative 1, the No Project Alternative, would result in *greater* impacts than the Plan in the following 15 resource areas: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazard and Hazardous Materials, Hydrology and Water Quality, Public Services, Transportation and Traffic, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire.

Alternative 1 would result in *similar* impacts as the Plan in the following two resource areas: Noise and Population and Housing.

Alternative 1 would result in less severe impacts compared to the Plan for the following two resource areas: Land use and Mineral Resources.

On balance, the Project is environmentally superior compared to Alternative 1, the No Project Alternative.

Findings and Rationale

The No Project Alternative does not avoid the significant and unavoidable impacts of the Plan, and in several instances the impacts would be more adverse due to the failure to achieve reductions in the consumptive use of land, energy, and water resources achieved through the policies and program embedded in the Plan that facilitate a more efficient use of these resources. SCAG Regional Council finds that specific economic, financial, legal, social, technological, or other considerations, including policy considerations, make Alternative 1 infeasible, and rejects this Alternative for the following reasons.

Reason 1. Alternative 1 fails to meet all the project objectives as follows:

- Encourage regional economic prosperity and global competitiveness

- Alternative 1 does not align plan investments and policies with improving regional economic prosperity because it would not use transportation investments to create economic benefits; nor would it enhance the goods movement system to support economic development to the same degree as the Plan.
- Improve mobility, accessibility, reliability, and travel safety for people and goods
 - Alternative 1 does not improve mobility, accessibility, and reliability for people and goods in the region because it would not create equitable transportation opportunities for all communities or ensure access to jobs, services, and recreation for populations with fewer transportation choices as would the Plan.
- Enhance the preservation, security, and resilience of the regional transportation system
 - Alternative 1 does not enhance the preservation, security, and resilience of the regional transportation system to the same degree as the Plan. Furthermore, Alternative 1 would not maintain the transportation system in a good state of repair or improve emergency preparedness as would the Plan.
- Reduce greenhouse gas emissions and improve air quality
 - Alternative 1 does not reduce greenhouse gas emissions or improve air because (1) all transit improvements associated with the Plan would not be available; (2) efficient management of the transportation system and demands on the system would not be provided to the same degree as the Plan; (3) SB 375 GHG emissions targets for passenger cars and light trucks would not be met; (4) regional air quality would not improve to the same degree as the Plan; and (5) land use strategies identified in the Plan, which calls for a more compact, efficient land use pattern would not be sufficiently employed to achieve the benefits of compact development achieved by the Plan.
- Support healthy and equitable communities
 - Alternative 1 does not support healthy and equitable communities because it does not provide the Plan’s transit improvements that would offer efficient and affordable travel options. It would not meet the GHG emissions targets that would support public health.
- Adapt to a changing climate and support an integrated regional development pattern and transportation network
 - Alternative 1 does not adapt to a changing climate or support an integrated regional development system and transportation network because the Plan’s investments in transportation and land use improvements would not be implemented. Connect SoCal includes proposed strategies for transportation investments, totaling approximately \$638.6 billion.
- Leverage new transportation technologies and data-driven solutions that result in more efficient travel
 - Alternative 1 does not leverage new transportation technologies or data-driven solutions for travel. The Plan encourages incentives for transportation efficiency and land use patterns that would reduce transportation energy usage.

- Encourage development of diverse housing types in areas that are supported by multiple transportation options
 - Alternative 1 does not encourage diverse housing types because it does not have sufficient land use and growth patterns to facilitate transit and other alternative transportation because it does not employ the same level of commitment to the land use and transportation strategies in the Plan that encourage increased density and a compact land form and facilitates transit and non-motorized transportation.
- Promote conservation of natural and agricultural lands and restoration of critical habitats.
 - Alternative 1 does not promote conservation of natural and agricultural lands. It consumes the most greenfield land (64,608 acres) of all three alternatives. Alternative 1 would convert 10,101 acres from agriculture to urban, compared to 6,732 acres under the Plan.

Reason 2. Alternative 1 does not avoid or substantially lessen the significant and unavoidable environmental impacts for the Plan, and in several instances the impacts would be more adverse due to the failure to achieve reductions in the consumptive use of land, energy, and water resources achieved through the policies and program embedded in the Plan that facilitate a more efficient use of these resources.

Reason 3. Alternative 1 is legally infeasible. It does not meet the requirements of federal transportation planning law. Pursuant to 23 USC §134(i), SCAG is required to “prepare and update” its RTP every four years if it encompasses an area designated as nonattainment under the federal Clean Air Act. Nor would Alternative 1 include the SCS as a component to the RTP as required pursuant to SB 375 (California Government Code §65080(b)(2)(B)). Alternative 1 also does not meet the requirements of 23 USC §134(h)(1), which requires that the RTP contain projects and strategies that will:

- A. Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;
- B. Increase the safety of the transportation system for motorized and non-motorized users;
- C. Increase the security of the transportation system for motorized and non-motorized users;
- D. Increase the accessibility and mobility of people and for freight;
- E. Protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns;
- F. Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;
- G. Promote efficient system management and operation; and
- H. Emphasize the preservation of the existing transportation system.

Reason 4. The No Project Alternative does not avoid the significant and unavoidable impacts of the Plan, and in several instances the impacts would be more adverse due to the failure to achieve reductions in the consumptive use of land, energy, and water resources achieved through the policies and program embedded in the Plan that facilitate a more efficient use of these resources. The Plan would have less than significant impacts when compared to the No Project Alternative.

For the reasons described above, SCAG Regional Council finds that the specific economic, legal, social, technological, and environmental consideration summarized herein make Alternative 1 infeasible for consideration.

7.4 ALTERNATIVE 2: EXISTING PLANS - LOCAL INPUT ALTERNATIVE

Description of Alternative

The Existing Plans - Local Input Alternative is aligned with the Existing Plans – Local Input Scenario in the Plan.¹⁹ This alternative incorporates local general plans and land use information to reflect the Plan’s population, household and employment growth estimates in the region. The Plan’s transportation and land use strategies are not included in this alternative. The transportation network analyzed under this alternative are the transportation projects planned by each County Transportation Commission (CTC) in the region. In general, this alternative represents a more dispersed land use pattern as compared to Connect SoCal.

Effectiveness in Meeting Project Objectives

The Existing Plans – Local Input Alternative, meets some but not all the project goals. Specifically, it is less effective than the Plan in meeting Plan 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.

¹⁹ Connect SoCal – Sustainable Communities Strategy Technical Report.

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 critical habitats. Ability to Avoid or Substantially Lessen the Significant and Unavoidable Impacts of the Plan

Alternative 2 does not avoid or substantially lessen any of the significant and unavoidable impacts of the Plan.

As set forth in detail in Section 4.0 of the PEIR, Alternative 2, Existing Plans with Local Input Alternative, would result in *greater* impacts than the Plan in the following 16 resource areas: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Public Services, Transportation and Traffic, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire.

Alternative 2 would result in *similar* impacts as the Plan in the following four resource areas: Land Use, Noise, Population and Housing, and Utilities (Solid Waste).

No environmental resource area would result in less severe impacts with Alternative 2 compared to the Plan.

On balance, the Project is environmentally superior compared to Alternative 2, the Existing Plans with Local Input Alternative.

Findings and Rationale

SCAG Regional Council finds that specific economic, financial, legal, social, technological, or other considerations, including policy considerations, make Alternative 2 infeasible and rejects this Alternative for the following reasons:

Reason 1. Alternative 2, meets some but not all the Project objectives. Specifically, it is less effective than the Project in meeting the following plan goals:

- Encourage regional economic prosperity and global competitiveness
 - The Existing Plans – Local Input Alternative would not include the strategies in the Plan (for example, strategies related to job centers and goods movement) that will enhance regional prosperity.
- Improve mobility, accessibility, reliability, and travel safety for people and goods
 - The Existing Plans – Local Input Alternative would not reduce VMT to the same extent as the Plan and would not achieve the GHG reduction goals set by CARB.
- Enhance the preservation, security, and resilience of the regional transportation system
 - The Existing Plans – Local Input Alternative does not include the Plan’s safety and resilience strategies and therefore would not achieve this goal.
- Increase person and goods movement and travel choices within the transportation system
 - The Existing Plans – Local Input Alternative does not include the goods movement strategies aimed at increasing person and freight mobility, including critical access projects.
- Reduce greenhouse gas emissions and improve air quality
 - The Existing Plans – Local Input Alternative would not reduce greenhouse gas emissions or improve air quality to the same extent as the Plan.
- Support healthy and equitable communities
 - The Existing Plans – Local Input Alternative would not include the regional strategies for complete streets and jobs/housing balance and planning for trips that reduce dependence on solo car trips.
- Adapt to a changing climate and support an integrated regional development pattern and transportation network
 - The Existing Plans – Local Input Alternative would not include the “green region” strategies such as supporting climate action plans, renewable energy production, and integrated food production.
- Leverage new transportation technologies and data-driven solutions that result in more efficient travel
 - The Existing Plans – Local Input Alternative would not include strategies such as promoting low emissions technologies, shared rides, car and bike sharing and scooters, as well as improving access to services through technology.
- Encourage development of diverse housing types in areas that are supported by multiple transportation options
 - The Existing Plans – Local Input Alternative would not include the Plan’s strategies to focus growth near destinations and mobility options.
- Promote conservation of natural and agricultural lands and restoration of critical habitats.

- The Existing Plans – Local Input Alternative would result in the consumption of more natural lands and habitat lands as compared to the Plan

Reason 2. Alternative 2 does not avoid or substantially lessen the significant and unavoidable environmental impacts of the Plan, and in several instances the impacts would be more adverse due to the failure to achieve reductions in the consumptive use of land, energy, and water resources achieved through the policies and program embedded in the Plan that facilitate a more efficient use of these resources.

Reason 3. Alternative 2 would not meet the GHG emissions targets for passenger cars and light trucks as required by SB 375, is therefore, legally infeasible.

Reason 4. The level of impact for Alternative 2 varies in relation to the land use development pattern, but is not capable of avoiding any of the significant and unavoidable impacts of the Plan, because those impacts are primarily associated with net increase in population that is anticipated for the SCAG region. Alternative 2 requires implementation of the same mitigation measures required for the Plan but would not resolve any of the significant and unavoidable impacts of the Plan.

For the reasons described above, SCAG Regional Council finds that the specific economic, legal, social, technological, and environmental consideration summarized herein make Alternative 2 infeasible for consideration.

7.5 ALTERNATIVE 3: INTENSIFIED LAND USE ALTERNATIVE (ENVIRONMENTALLY SUPERIOR ALTERNATIVE)

Description of Alternative

This Intensified Land Use Alternative is based off the Plan’s transportation network and strategies. This alternative analyzes more aggressive densities and land use patterns than included in the Accelerated Tomorrow Scenario.²⁰ The land use pattern builds on the land use strategies as described in the Connect SoCal Plan and beyond. Specifically, it increases densities and intensifies land use patterns of the Plan, especially around HQTAs in an effort to maximize transit opportunities. The growth pattern associated with this alternative optimizes urban areas and suburban town centers, transit-oriented developments (TODs), HQTAs, livable corridors, and neighborhood mobility areas. It also includes a greater progressive job-housing distribution optimized for TODs and infill in HQTAs. It includes the same transportation investments as the Plan. This alternative considers the basis of the Plan with enhancements to accelerate

²⁰ Connect SoCal – Sustainable Communities Strategy Technical Report.

the SB 375 GHG emissions reduction trend into 2045 and beyond, and includes related improvements for air quality, livability, public health, active transportation opportunities, and affordability.

While the Intensified Land Use Alternative would be considered the environmentally superior alternative because of the more compact land use patterns fewer emissions and reduced VMT, this alternative requires implementation of the same mitigation measures required for the Connect SoCal Plan and would not resolve any of the significant and unavoidable impacts of the Plan. However, the more intensified and compact land use development pattern would result in somewhat less adverse impacts to energy, land, and water resources due to the denser pattern of development. The Intensified Land Use Alternative would also achieve greater overall reductions in criteria air pollutants and greenhouse gas emissions, as a result of the more compact pattern of land use development. The level of impact for the Existing Plan – Local Input Alternative and the Intensified Land Use Alternative varies in relation to the land use development pattern, but neither is capable of avoiding any of the significant and unavoidable impacts of the Plan, because those impacts are primarily associated with net increase in population anticipated for the SCAG region. Therefore, the comparative impacts between the alternatives and the Plan are primarily related to the level of severity of the impacts.

Effectiveness in Meeting Project Objectives

The Intensified Land Use Alternative is capable of meeting most of the goals of the Plan. However, because it would place a large portion of growth in existing communities it may conflict with local plans or place a burden on some community facilities such as parks and other services to a greater extent than the Plan. Therefore, it is less effective in meeting the following goal:

1. Support healthy and equitable communities. The Intensified Land Use Alternative would not achieve this goal to the same extent as the Plan due to its focus on compact development beyond what is currently contemplated under the Plan. The emphasis on development in urban communities may result in overuse of parks and other services (police, fire, schools, library) which has the potential to result in quality of life impacts in urban areas.

Ability to Avoid or Substantially Lessen the Significant and Unavoidable Impacts of the Plan

Of the three alternatives, the Intensified Land Use Alternative would be considered the environmentally superior alternative due to fewer impacts overall as a result of reduced VMT and GHG emissions, and because it would substantially restrict the use of land for single-family development, in a manner that differs from the adopted general plans of the six counties and 191 member cities in the SCAG region. This alternative concentrates development in existing urban centers, and near transit stations and activity

centers. As such, the Intensified Land Use has less impact on rural and undeveloped areas, specifically greenfields. However, the Intensified Land Use Alternative would have more severe impacts on the built environment (i.e., seven CEQA impact categories: land use; noise and vibration, public services, traffic delay, and overtaxed recreation facilities in the vicinity of HQTAs).

As set forth in detail in Section 4.0 of the PEIR, Alternative 3, Intensified Land Use Alternative, would result in *greater* impacts than the Project in the following seven resource areas: Aesthetics, Agricultural Resources, Cultural Resources, Land Use, Recreation, Transportation and Traffic, and Utilities (Wastewater).

Alternative 3 would result in *similar* impacts as the Project in the following two resource areas: Population and Housing and Utilities (Solid Waste).

Alternative 3 would result in less severe impacts compared to the Project in the following eight resource areas: Biological Resources, Energy, Hydrology and Water Quality, Mineral Resources, Public Services, Tribal Cultural Resources, Utilities (Water Supply), and Wildfire.

On balance, Alternative 3, the Intensified Land Use Alternative, is environmentally superior compared to the Project.

Findings and Rationale

The SCAG Regional Council finds that specific economic, financial, legal, social, technological, or other considerations, including policy considerations, make Alternative 3 infeasible and rejects this Alternative for the following reasons:

Reason 1. Alternative 3 meets some but not all of the project objectives. It is less effective than the project with respect to the following goal:

- Support healthy and equitable communities
 - The Intensified Land Use Alternative would not achieve this goal to the same extent as the Plan due to its focus on compact development beyond what is currently contemplated under the Plan. The emphasis on development in urban communities may result in overuse of parks and other services (police, fire, schools, library) which has the potential to result in quality of life impacts in urban areas.

Reason 2. While the Intensified Land Use Alternative would be considered the environmentally superior alternative because of the more compact land use patterns fewer emissions and reduced VMT, this alternative requires implementation of the same mitigation measures required for the Connect SoCal Plan and would not resolve any of the significant and unavoidable impacts of the Plan. However, the more

intensified and compact land use development pattern would result in somewhat less adverse impacts to energy, land, and water resources due to the denser pattern of development. The Intensified Land Use Alternative would also achieve greater overall reductions in criteria air pollutants and greenhouse gas emissions, as a result of the more compact pattern of land use development.

Reason 3. The level of impact for the Existing Plan – Local Input Alternative and the Intensified Land Use Alternative varies in relation to the land use development pattern, but neither is capable of avoiding any of the significant and unavoidable impacts of the Plan, because those impacts are primarily associated with net increase in population anticipated for the SCAG region.

For the reasons described above, SCAG Regional Council finds that the specific economic, legal, social, technological, and environmental consideration summarized herein make Alternative 3 infeasible for consideration.

8.0 FINDINGS REGARDING MITIGATION MONITORING AND REPORTING PROGRAM

8.1 REQUIREMENTS OF MITIGATION MONITORING AND REPORTING PROGRAM

According to Section 21081.6 of the Public Resources Code, the California Environmental Quality Act requires that when a public agency is making the findings required by Sections 21081, the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted to mitigate or avoid significant effects on the environment.

SCAG, through its governing body, the Regional Council, hereby finds that the Mitigation Monitoring and Reporting Program (MMRP) meets the requirements of Section 21081.6 of the Public Resources Code by providing a monitoring program designed to ensure compliance during implementation of the Plan. The MMRP monitors the mitigation measures to be implemented by SCAG, and the mitigation measures that can and should be considered by lead agencies at the individual project-level, as applicable and feasible. Project-level mitigation may be required as a result of evaluation and entitlement of subsequent transportation and developments projects during implementation of the Plan and are wholly within the authority, responsibility, and/or jurisdiction of project-level lead agencies or other agencies serving as lead agencies under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes.

9.0 FINDINGS REGARDING LOCATION & CUSTODIAN OF DOCUMENTS

9.1 LOCATION AND CUSTODIAN OF DOCUMENTS

Section 15091(e) of the California Code of Regulations, *California Environmental Quality Act Guidelines*, requires the public agency to specify the location and custodian of the documents or other materials that constitute the record of proceedings upon which the decision is based. Section 6.1 of the Program Environmental Impact Report (PEIR) contains a list of all references used in the preparation of the environmental analysis. Unless otherwise noted, reference materials are located at SCAG Main Office, which shall also serve as the custodian of the documents constituting the record of proceedings upon which the Regional Council, the governing board for SCAG, has based its decision related to the project. The designated location and custodian of documents is as follows:

Southern California Association of Governments

Attn: Mr. Roland Ok
900 Wilshire Blvd., Suite 1700
Los Angeles, California 90017
Telephone: (213) 236-1819
E-Mail: ok@scag.ca.gov

For purposes of CEQA, the Record of Proceedings for the Connect SoCal Plan consists of the following documents, at a minimum:

- The Notice of Preparation and all other public notices issued by SCAG and in conjunction with the Plan.
- The Draft and Final PEIRs, including appendices and technical studies included or referenced in the Draft and Final PEIRs.
- All comments submitted by agencies or members of the public during the 46-day public comment period on the Draft PEIR.
- The MMRP for the Plan.
- All Findings and resolutions adopted by the SCAG Regional Council in connection with the Plan, and all documents cited or referred to therein.
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Plan.
- All documents and information submitted to SCAG by responsible, trustee, or other public agencies, or by individuals or organizations, in connection with the Plan, up through the date the SCAG Regional Council approved the Plan.

9.0 Findings Regarding Location & Custodian of Documents

- Minutes and/or summary transcripts of all public meetings and public hearings held by SCAG, in connection with the Plan.
- Any documentary or other evidence submitted to SCAG at such public meetings and public hearings.
- Matters of common knowledge to SCAG, including, but not limited to federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings, in addition to those cited above.
- Any other materials required to be in the Record of Proceedings by Public Resources Code Section 21167.6(e).

References associated with the PEIR, and technical analysis related to the PEIR for this project that are not available from the SCAG, are located at Impact Sciences Inc.

Impact Sciences, Inc.

Attn: Jessica Kirchner Flores, AICP, ENV SP
811 W. 7th Street, Suite 200
Los Angeles, CA 90017
Phone: 213.935.1901
E-mail: jflores@impactsciences.com

10.0 CERTIFICATION REGARDING INDEPENDENT JUDGMENT

Pursuant to Section 21082.1(c) of the Public Resources Code, SCAG certifies that the Regional Council, as the governing body for SCAG, has independently reviewed and analyzed the Final Program Environmental Impact Report (Final PEIR) for the Connect SoCal (“Plan” or “Project”), on behalf of SCAG. SCAG’s Energy and the Environment Committee (EEC), Joint Policy Committees, Technical Working Group (TWG), and Staff have provided input and/or reviewed the Draft PEIR including supporting technical appendices prior to circulation for public review. The Final PEIR similarly has been subject to review by the EEC, Joint Policy Committees, TWG, and Staff.

It is the finding of the SCAG Regional Council that the Final PEIR fulfills environmental review requirements for the Plan, that the document constitutes a complete, accurate, adequate, and good faith effort at full disclosure under CEQA, and reflects the independent judgment of the SCAG Regional Council.

11.0 SUMMARY OF FINDINGS

Based on the information contained in the record, the SCAG Regional Council incorporates the foregoing findings herein and provides this summary of findings with respect to the significant impacts on the environment resulting from the Connect SoCal (“Plan” or “Project”) pursuant to Section 15091 of the *State California Environmental Quality Act (CEQA) Guidelines*.

- Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effects as identified in the Final Program Environmental Impact Report (PEIR).
- Some changes and alterations are within the responsibility and jurisdiction of another public agency that can and should be adopted by such other agency; and SCAG has no concurrent jurisdiction with the other agency to deal with the identified project-level mitigation measures.
- Consistent with the provisions of Section 15091(a)(2) of the *State CEQA Guidelines*, SCAG has identified performance standards-based mitigation measures that are within the responsibility and jurisdiction of other public agencies, including lead agencies, and that can and should be considered to mitigate project-level impacts, as applicable and feasible, or other comparable measures.
- Pursuant to Section 15091(c) of the *State CEQA Guidelines*, SCAG has adopted a Mitigation Monitoring and Reporting Program which identifies responsible agencies for the mitigation measures.
- The mitigation measures to be implemented by SCAG as identified in the Final PEIR are feasible and are required as conditions of approval of the Plan.

Based on the foregoing findings and the substantial evidence contained in the record, and as conditioned by the foregoing findings:

- All significant effects on the environment due to the Project have been eliminated or substantially lessened where feasible.
- Any remaining significant effects on the environment found to be unavoidable are acceptable due to the overriding concerns set forth in the Statement of Overriding Considerations.



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EXHIBIT B - FINDINGS OF FACT
FOR THE CONNECT SOCIAL PLAN

ADOPTED MAY 2020

connectsocial.org