

Appendix H

Comment Letters Received on the 2024 Draft PEIR





Letter SOV 1

January 12, 2024

[VIA EMAIL TO:ConnectSoCalPEIR@scag.ca.gov]
Southern California Association of Governments
Karen Calderon
900 Wilshire Blvd, Suite 1700
Los Angeles, CA 90017

Re: SoCal Connect 2024 Draft Program EIR Comments

Dear Karen Calderon,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Connect SoCal 2024 project. We have reviewed the documents and have the following comments:

*Please provide our office with updates or a status report of the project as it progresses. Also, please inform our office if there are changes to the scope of this project.

SOV 1-1

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760) 883-1137. You may also email me at ACBCI-THPO@aguacaliente.net.

SOV 1-2

Cordially,

Luz Salazar
Cultural Resources Analyst
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

Letter FED 1 (Late)



DEPARTMENT OF THE NAVY
NAVAL BASE VENTURA COUNTY
311 MAIN ROAD, SUITE 1
POINT MUGU, CA 93042-5033

IN REPLY REFER TO:
11011
January 12, 2024

Southern California Association of Governments
Attention: Karen Calderon, Project Director
900 Wilshire Boulevard, Suite 1700
Los Angeles, California 90017

Dear Ms. Calderon:

Subject: COMMENTS ON DRAFT PROGRAM ENVIRONMENTAL IMPACTS REPORT FOR THE CONNECT SOCAL 2024 REGIONAL TRANSPORTATION PLAN AND SUSTAINABLE COMMUNITY STRATEGY (RTP/SCS)

This letter is in response to Naval Base Ventura County's review and comments on Draft Program Environmental Impact Report (PEIR) prepared for the Connect SoCal 2024 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The military operating areas under my command within the Southern California Association of Governments (SCAG) planning authority include Naval Base Ventura County (NBVC), which is comprised of three non-contiguous navy operating bases within Ventura County, California.

FED 1-1

NBVC shares similar transportation needs as other military installations in the SCAG planning region, in that defense readiness training operations and resilient military mobilization require a sufficient transportation network, so that cargo, oversized vehicles, and personnel can be moved as quickly and safely as possible.

My staff and I have reviewed the Draft PEIR for the Connect SoCal 2024 RTP/SCS and provide SCAG our project comments and offer the following planning recommendations, below.

Military installations, including NBVC, require safe and efficient transport of personnel and freight via the State's Strategic Highway Network (STRAHNET) and additional roadways that serve military sites. The PEIR should identify the STRAHNET, other roadways and intermodal facilities not included in the STRAHNET. SCAG should consider how increased congestion and land use changes may impact defense readiness, and the ability to respond to surge capabilities as the region continues to grow.

FED 1-2

The impacts of relative sea level rise and storm surge have been recognized along the coast, making coastline vulnerable military facilities such as NBVC (Point Mugu and Port Hueneme) susceptible to storm surge threats, coupled with sea water intrusion and coastal floods impacting mission readiness. The PEIR should carefully consider the effects of climate stressors on the region's transportation networks; SCAG should integrate climate resilience adaptation programs and mitigation strategies for phasing implementation of Connect SoCal 2024 RTP/SCS.

FED 1-3

Subject: COMMENTS ON DRAFT PROGRAM ENVIRONMENTAL IMPACTS REPORT FOR THE CONNECT SOCAL 2024 REGIONAL TRANSPORTATION PLAN AND SUSTAINABLE COMMUNITY STRATEGY (RTP/SCS)

Connect SoCal 2024 RTP/SCS and Draft PEIR should at a minimum include the following:

1. Include a map of all military installations and airfields in the SCAG planning region. FED 1-4
2. Include an overview of the roles that military installations have in the region, including a brief description of each installation's current and future mission(s), and land-use compatibility needs. FED 1-5
3. Ensure that the Strategic Highway Corridor Network (STRAHNET) and STRAHNET Connectors are identified on maps illustrating RTP/SCS Mobility Network across the SCAG planning authority. Discuss critical modes of access and transportation needs to the installation for both people and cargo. FED 1-6
4. Include California Defense Spending and Economic Impacts Data published in U.S. Department of Defense Office of Local Defense Community Cooperation's Defense Spending by State Fiscal Year 2022, Revised Version (October 2023), available at: <https://oldcc.gov/dsbs-fy2022>. FED 1-7
5. Demonstrate consistency with California's Office of Planning and Research document, *California Advisory Handbook for Community and Military Compatibility Planning; 2016 Update* (October 2016), available at: https://www.opr.ca.gov/docs/20190812-2016_CA_Handbook.pdf. FED 1-8

Department of Defense (DoD) does not own or operate STRAHNET or other transportation routes. Therefore, the DoD depends on a strong partnership with State and local transportation agencies, planning organization, and local governments to address deficiencies to infrastructure that supports national defense. To ensure the Navy remains mission ready, we recommend continuous collaboration in long-range transportation planning; congestion management; and project programming, development, and sustainable design processes. This will help foster a common understanding of transportation needs and challenges that military activities present to the planning process. FED 1-9

Thank you for your time and consideration of NBVC project comments on the draft PEIR for Connect SoCal 2024 RTP/SCS. For additional coordination, please contact Mr. Kendall Lousen, NBVC Community Planning Liaison Officer, at telephone: (805) 989-0333 or via email address at kendall.p.lousen.civ@us.navy.mil. FED 1-10

Sincerely,



R. B. KIMNACH III
R. B. KIMNACH III
Captain, U.S. Navy
Commanding Officer

Copy to:
COMNAVREGSW (N46)

21659, "Hazards Near Airports Prohibited" prohibits structural hazards near airports. To ensure compliance with Federal Aviation Regulation, Part 77, "Objects Affecting Navigable Airspace," submission of a Notice of Proposed Construction or Alteration (Form 7460-1) to the Federal Aviation Administration (FAA) may be required. In addition, any proposed projects identified as hazardous material sites compiled pursuant to Government Code Section 65962.5, compatibility restrictions should be reviewed per the ALUCP of an airport.

STA 1-2
(cont.)

While given the regional scale of the environmental impact analysis it may be difficult to ensure impacts to airport-related noise and safety hazards to be fully mitigated, therefore project-level agencies should consider project-level mitigation measures and adherence to the local ALUCP of an airport for compatibility guidelines and restrictions.

An ALUCP is crucial in minimizing noise nuisance and safety hazards around airports while promoting the orderly development of airports, as declared by the California Legislature. A responsibility of the ALUC is to assess potential risk to aircraft and persons in airspace and people occupying areas within the vicinity of the airport.

STA 1-3

The Aeronautics Program commends SCAG and encourages the continued collaboration with aviation stakeholders on regional aviation planning issues, such as its partnership with the Aviation Technical advisory committee (ATAC). The Aeronautics Program also commends SCAG for highlighting electrification measures, active transportation and connections to airports, and land use planning for climate-related hazards that may affect airports and regional air transportation.

STA 1-4

If you have any questions or need additional information, please contact me at my email address: tiffany.martinez@dot.ca.gov.

Sincerely,

Tiffany Martinez
Transportation Planner, Aeronautics Program

c: State Clearinghouse

Letter STA 2

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 7
100 SOUTH MAIN STREET, SUITE 100 | LOS ANGELES, CA 90012
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Caltrans



January 12, 2024

Mr. Kome Ajise
Executive Director
Southern California Association of Governments
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

Dear Mr. Ajise:

The California Department of Transportation (Caltrans) wishes to thank the Southern California Association of Governments (SCAG) for the opportunity to review and comment on the Draft Connect SoCal, 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the Technical Reports, the FTIP Consistency Amendment and the Draft Program Environmental Impact Report (PEIR).

Caltrans would like to emphasize its support for SCAG's vision for a more equitable future, and lauds SCAG's vision for the Connect SoCal 2024-2050 RTP/SCS, "In 2050, Southern California will be a healthy, prosperous, accessible and connected region for a more resilient and equitable future," highlighting a sustainable future that hinges on a commitment to improved public health, fosters an inclusive and resilient economy, transportation that is efficient, multimodal and accessible to all, and is characterized by connected and vibrant communities in the Southern California region.

SCAG's commitment to strengthen previous investments in our multi-modal transportation system, in concert with the considerations identified in Connect SoCal 2024-2050 RTP/SCS that will inform and guide SCAG's approach to future plan investments, are expected to increase the region's resiliency and competitiveness, as well as contribute to greater prosperity for all.

The Draft Connect SoCal plan was distributed to Caltrans' Headquarters Offices in Planning, and to Districts 7 (Los Angeles and Ventura Counties), 8 (San Bernardino and Riverside Counties), 11 (San Diego and Imperial Counties), and 12 (Orange County) for review and comment.

Comments on the Draft RTP/SCS document and the associated Technical Reports as well as the FTIP Consistency Amendment are included in Attachment A. Comments on the Draft PEIR are included in Attachment B.

If you should have any questions in regard to the comments, please do not hesitate to contact Dan Kopulsky of my staff at (213) 317-0566 or dan.kopulsky@dot.ca.gov.

Sincerely,

Marlon Regisford

Marlon Regisford
District 7 Deputy District Director for Planning, District 7

"Provide a safe and reliable transportation network that serves all people and respects the environment"

STA 2-1

Mr. Kome Ajise
January 12, 2024
Page 2

cc: Gloria Roberts, District 7 Director
Ray Desselle, District 8 Deputy District Director for Planning
Roy Abboud, Acting District 11 Deputy District Director for Planning
Lan Zhou, District 12 Deputy District Director for Planning
Erin Thompson, Office Chief, Regional and Community Planning

Attachments

ATTACHMENT A: COMMENTS

**RTP/SCS Documents, Technical Reports, Air Quality Conformity
and FTIP Consistency Amendment.**

Caltrans Headquarters

HQ Office of Regional Planning and HQ Air Quality Branch

Thank you for the opportunity to review and comment on the Southern California Association of Governments (SCAG) Draft 2024 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). HQ Office of Regional Planning would like to offer the comments below to assist in the development of the plan. The comments below correspond to the RTP Checklist for MPOs.

The Division of Transportation Planning, Air Quality Branch also completed a quality assurance review of the SCAG Connect SoCal Transportation Conformity Analysis and the Conformity Analysis Documentation checklist. The comments are identified in the Transportation Conformity Analysis section and correspond to the Conformity Analysis Documentation checklist.

Overall, the page references on the RTP Checklist included whole chapters and entire technical reports, which hindered ease of reviewing the documents to provide Stakeholder feedback. We recommend that SCAG reference specific page numbers for each question on the RTP Checklist with their Final RTP submission.

Consultation and Cooperation:

- (1.x) Please expand the RTP/Public Participation and Consultation Technical Report to further explain how SCAG periodically reviews the effectiveness of its procedures and strategies contained in the participation plan to ensure a full and open participation process.
- (5) Please expand on which specific agencies SCAG consulted with for land use, natural resources, environmental protection, conservation, and historic preservation.

Modal:

- (4) SCAG identifies Main Book Chapter 3 as discussing the regional airport system. Airports are only covered as an implementation strategy, but not a detailed discussion within the Main Book. The Technical Reports do discuss plans for the regional airport system.
- (7) SCAG identifies Main Book Chapter 3 as discussing the California Coastal Trail. This trail network is not discussed within the Main Book. The Mobility Technical Report does mention how pursuant to state law, SCAG is required to incorporate the California Coastal Trail access and completion into its regional transportation planning process, however, it is unclear how and when SCAG will be completing their portions of the Coastal Conservancy's 2003 California Coastal Trail Plan.
- (9) SCAG identifies Main Book Chapter 3 as discussing the maritime transportation. Maritime is only briefly covered as an implementation strategy, but not a detailed discussion within the Main Book. The Goods Movement Technical Report does discuss new projects.

Financial:

- (9) SCAG list the Transportation Finance Technical Report as addressing strategies to ensure their identified Transportation Control Measure (TCMs) from the State Implementation Plan (SIP) can be implemented. Neither TCMs nor the SIP are addressed in this report. SCAG should update its checklist to reference the Transportation Conformity Analysis Technical Report, which does have discussion about the TCMs.

Transportation Conformity Analysis:

- There is a typo in section 2.3 Vehicle Registrations (p.17); See November 15, 2221.
- (93.102) We were unable to locate information pertaining to the applicable pollutants and the maintenance area in the Executive Summary. Please confirm inclusion on the page column. The other sections did include the required information for this regulation.
- (93.102) Pechanga Indian Reservation is listed as non-attainment for PM2.5. Please confirm accuracy using the EPA Green Book: <https://www3.epa.gov/airquality.greenbook.anayo.ca.html>.
- (93.102) Please confirm accuracy of PM10 designations in Imperial County EPA Green Book: <https://www3.epa.gov/airquality.greenbook.anayo.ca.html>.
- (93.104 (b, c)) Include the final board adoption resolution in the final submittal package.
- (93.108) Information on fiscal constraint of that plan was also found in Chapter 4 Financial Constraints Analysis. We recommend including this reference in the 'page' column
- (93.110 (a, b)) Document the date upon which the conformity analysis was begun.

2023 FSTIP Finding:

- Per the 2023 FSTIP finding and discussed in the Statewide Overall Work Program (OWP) meeting in December 2022 and subsequent individual OWP meetings, MPOs must include Performance Based Planning and Programming in its Regional Transportation Plan (RTP).
 - MPOs must describe its decision-making process for prioritizing and selecting projects regionally for funding.
 - SCAG mentions that the County Transportation Commissions (CTCs) prioritize and select projects that align with the Regional Goals, but this process needs to be open and transparent. SCAG should work with/ ensure that each of the CTCs have a clear and transparent process for selecting projects.
 - SCAG needs to enhance their language for how they prioritize and select projects to meet the Federal Performance Measures for Performance Management (PM) 1, 2, and 3. In the Performance Monitoring Technical Report SCAG should state how they are working with the CTCs to ensure that the projects selected are also furthering the Federal Performance Measures.
- SCAG does discuss how they have a list of Federal Land Management Agencies (FLMA)s which they coordinate and consult with, as appropriate. SCAG should make an effort to consult with FLMA)s during all the stages of the planning and implementation process. Please expand on how SCAG plans to explore opportunities to leverage transportation funding to support access and transportation needs of Federal Land Management Agencies (FLMA)s before transportation projects are programmed in the Federal Transportation Improvement Program (FTIP) and Federal Statewide Transportation Improvement Program (FSTIP).

HQ Office of Rail Planning and Implementation

Comments on Draft Connect SoCal 2024

1. Pg33/Emerging Technology - Consider including integrated ticketing (i.e. efforts related to Cal-ITP) which is separate from ITS and focuses on linking multi-modal systems more efficiently for a better user experience that can also be more cost effective.

2. Pg35/Climate Action - Connection to Climate Action Plan for Transportation Infrastructure (CAPTI) is relevant. Recommend addressing how the RTP aligns with CAPTI guiding principles throughout document as appropriate. Link: <https://calsta.ca.gov/subject-areas/climate-action-plan>
3. Pg46/Funding the System - Consider expanding on what innovative and strategic options may be needed (not just the need for new funding); consider exploring specific strategies for leveraging federal funds as well.e
4. Pg62/Collaboration and Policy - Consider including reference to include crucial to supporting State goals.e
5. Pg85/Mobility - Instead of "transportation network", consider rephrasing as "integrated multi-modal transportation network" to address/emphasize the need for integration/multi-modal; suggest additional language be included to address the need for an integrated multi-modal network.e
6. Pg88/Transit and Multi-Modal Integration - Recommend explaining what an integrated multimodal network includes which is not solely dependent on growth and land use patterns. Section appears to place emphasis on individual modes and needs to expand on what an integrated multimodal network includes as well as strategies (i.e. service integration; integrated ticketing; mode shift strategies, etc.).e
7. Pg88 - Consider identifying how specific policy's and/or strategies align with State objectives/planning documents.e
8. Pg88/System Preservation and Resilience - What are the strategies for addressing the need for system preservation and resilience? This section appears to identify the need and challenges but doesn't highlight actual strategies that need to be employed to meet this need. If this section is not intended to identify strategies, suggest the first paragraph under the main header referencing later section(s) that identify the policy (3.3) and related strategies (3.4). Also consider transit and rail here.e
9. Pg89/Funding the System/User Fees - Consider not just funding sources but exploring strategies for a more efficient, integrated multi-modal network as well as strategic prioritization of project implementation, which impact the ability to fund the system. Also, strategy should include identifying opportunities to maximize leveraging federal funds. Strategies for mode-shift should also be considered.e
10. Pg91/Focusing on System Efficiency - Recommend inclusion of multi-modal service integration (not just integrated pricing strategies or seamless trip planning).e
11. Pg101 - Consider discussion of complete streets and access to transit with the TPAs.e
12. Pg109/Clean Transportation - This section should address strategic investments for transit and rail, not just passenger vehicles.e
13. Pg114 - Consider adding "Collaboration between stakeholders for scheduling and increasing ridership"e
14. Pg114/Transit and Multi Modal Integration - Service integration is needed, not just connectivity.e
15. Pg114/Transit and Multi Modal Integration - Service integration between modes is also needed (i.e. timing of connections not just connections).e
16. Pg152/Funding/Investment Strategies - Suggest including strategies for how to most effectively leverage federal funds.e

HQ Office of Corridor and System Planning (System Planning Branch)

Comments on Draft Connect SoCal 2024

Chapter 1: Executive Summary

- e Pg 9 - Addressing Regional Challenges: How are **Natural Disaster Vulnerability**: Wildfires and Earthquakes impacts addressed in this plan? Southern California is prone to wildfires and earthquakes.e

Preparing for and mitigating the impact of these natural disasters requires ongoing efforts in urban planning, infrastructure resilience, and emergency response. We recommended to add to in Plan Goals; **Sustainability Goals:** Focus on sustainability, including measures to reduce greenhouse gas emissions, improve air quality, and promote alternative transportation modes.

Public Engagement: Inclusion of public input and stakeholder engagement throughout the planning process to ensure that community perspectives are considered.

Suggested Action: Would like to see how these are addressed.

- Pg 12 – Addressing Regional Challenges: How are **Natural Disaster Vulnerability:** Wildfires and Earthquakes impacts addressed in this plan? Southern California is prone to wildfires and earthquakes. Preparing for and mitigating the impact of these natural disasters requires ongoing efforts in urban planning, infrastructure resilience, and emergency response. We recommended to add to in Plan Goals; **Sustainability Goals:** Focus on sustainability, including measures to reduce greenhouse gas emissions, improve air quality, and promote alternative transportation modes.
Public Engagement: Inclusion of public input and stakeholder engagement throughout the planning process to ensure that community perspectives are considered.
Suggested Action: Would like to see how these are addressed.

Chapter 2: Our Region Today

- Pg 34 - Consider changing Innovative Clean Transit Rule to Innovative Clean Transit regulation.
Suggested Action: Change from rule to regulation
- Pg 46 - Consider changing California's Advanced Clean Cars II rule to California's Advanced Clean Cars regulation.
Suggested Action: Change from rule to regulation

Chapter 3: The Plan

- Pg 80 - It may be helpful to add income data or some type of economic data on demographic groups if available. This can highlight the need for investment in transportation infrastructure.
Suggested Action: Census Data would be helpful
- Pg 90 - Considering adding how projects are aligned with CAPTI
- Pg 91 - Consider adding how FIX-it first approach established in SB1 is in alignment with CAPTI framework. Emphasize build alternatives on reducing GHG/VMT.
- Pg 92 - Is it Possible to add improved times of corridors where ITS and Express Lanes have improved safety, congestion?
- Pg 124-129 - List the Qualitative/Quantitative metrics that would address CAPTI principles and compliance
- General Comment - Consider adding a dedicated map illustrating bike networks/trails

Chapter 4: Financial Summary

- Pg 139 - Figure 4.1 Shows 22% New Revenue. Where is this expected new revenue coming from? Are these from new federal funding opportunities or upcoming/new local tax measure revenues? Or is this just a speculation or expectation?
Suggested Action: We recommend to provide a brief detail or at least one example of where the new revenue is coming from, if known. (IJA, Road Usage Charge, etc.)
- Pg 144 - Figure 4.3 The graph only shows annual inflation to 2019. Is there a more recent or updated information that includes 2022 or 2023?
Suggested Action: We recommend to update or include a more recent information on annual inflation between 2020-2022.

- Pg 145 - Figure 4.4 The graph only shows Construction Cost Index to 2019. Please include the recent 2022 Caltrans Construction Cost Index in the graph. See: <https://ppmoe.dot.ca.gov/des/contractor-info.html>.
Also, please indicate and clarify in the Y-axis of the graph if the value is in dollar amount millions or thousands.
Suggested Action: We recommend to include the recent 2022 Caltrans Construction Cost Index in the graph: <https://ppmoe.dot.ca.gov/des/oe/docs/CCI.pdf>

Comments on Transportation Conformity Analysis Technical Report

- Pg 11 - That would be great if the document brought some text regarding health in explanation and impact and benefit.
Suggested Action: We recommend to include the recent 2022 Caltrans Construction Cost Index in the graph: <https://ppmoe.dot.ca.gov/des/oe/docs/CCI.pdf>
- Pg 16 - Provide data about disadvantaged communities
- Pg 21_Population Synthesis - Control variables, representing specific household and person attributes of interest, guide the synthesis process. This methodology allows the creation of a synthetic population for the entire SCAG region, offering a comprehensive dataset for regional planning. The significance of Population Synthesis becomes pronounced in scenarios where obtaining detailed, real-world data for the entire population is impractical or costly.
- Pg 22_Model Output - Predicts the time of day individuals choose to travel based on factors like work schedules, congestion patterns, and personal preferences. It helps in understanding and managing peak-hour congestion.
- Pg 22_Model Output - **Parking Choice Sub-Model:** Predicts the parking choices individuals make, considering factors such as availability, cost, and convenience. It's relevant for understanding parking demand and managing parking infrastructure.
- Pg 24 - Overall, the outlined milestones demonstrate a well-structured and inclusive process for developing regional growth forecasts, ensuring data accuracy, expert validation, and meaningful engagement with local stakeholders.
- Pg 33 - **Flexible Work Schedules:** Offering flexible work schedules, such as staggered work hours or compressed workweeks, provides employees with options to avoid peak commuting times and reduce overall travel.
- Pg 33 - **Encouraging Active Transportation:** Promoting walking, cycling, or other forms of active transportation can contribute to reducing work-related travel, especially for short-distance commutes.
Public Transportation Initiatives: Supporting and investing in public transportation infrastructure can encourage employees to use public transit, reducing the number of individual car commutes.
- Pg 62 – **Smart Growth Initiatives:** Implementing smart growth strategies that promote compact, mixed-use development to reduce the need for extensive vehicle travel and encourage transit-oriented development.
Electric Vehicle (EV) Infrastructure: Installing and expanding electric vehicle charging infrastructure to encourage the use of electric vehicles and reduce emissions from traditional gasoline-powered vehicles.
Green Roofs and Cool Pavements: Incorporating green roofs and cool pavement technologies to mitigate the urban heat island effect and improve air quality in densely populated areas.
- Pg 63 – **Smart Growth Initiatives:** Implementing smart growth strategies that promote compact, mixed-use development to reduce the need for extensive vehicle travel and encourage transit-oriented development.

Electric Vehicle (EV) Infrastructure: Installing and expanding electric vehicle charging infrastructure to encourage the use of electric vehicles and reduce emissions from traditional gasoline-powered vehicles.
Green Roofs and Cool Pavements: Incorporating green roofs and cool pavement technologies to mitigate the urban heat island effect and improve air quality in densely populated areas.

Comments on Congestion Management Technical Report

- Pg 5 - We suggest to provide the name of the California law that was passed in 1990.
Suggested Action: Consider the ballot title "Traffic Congestion Relief and Spending Limitation Act of 1990" or "California Proposition 111."
- Pg 14 - The draft mentions that level of service (LOS) is used to measure performance in each county Congestion Management Plan/, what are SCAG's plans to address the State's CAPTI and SB 743 goals to use VMT as a criterion instead of LOS for roadway performance?
Suggested Action: Could include how SCAG plans to promote the transition from LOS to VMT as a measure for roadway performance in CMPs and other policies and practices.

Comments on Performance Monitoring Technical Report

- Pg 23 - Consider explaining how project delays or funding delays may affect the outcome of the models and SCAG has a solution or contingency plan
- General Comment - How would SCAG deal with project/funding/alignment/political delays?
- General Comment - Is SCAG factoring in California electric vehicle mandate by 2035?
- General Comment - Is there enough emphasis on EV charging and supporting infrastructure to accommodate the mandate or just general growth in EV users
- General Comment - Consider mentioning, if true, how EV growth may positively impact environmental metrics such as air quality and resource efficiency
- General Comment - Consider referencing project(s) that are in the project list that will contribute to the significant reduction in daily per capita minutes of delay or reduction in congestion.
- General Comment - Priority Development areas list, consider adding how SCAG will prioritize transportation funding over the 20 years

Comments on Mobility Technical Report

- Pg 6 - Tables 1-2 and 1-3 do not capture significant and positive changes for other modes of transportation. There is no significant reduction in average commute distance by auto in 2050 compared to base year, and no increases in average distances by active transportation modes either. Primarily concerned that if these are the initial modelling results, the connect SOCAL 2024 plan may not achieve impactful changes for California's mobility.
Suggested Action: If the results hold, overall implementation strategies may need to be looked over. To achieve greater results beyond what the actions in this plan are capable of, legislative changes may be required.
- Pg 69 - Remote/Telework/Hybrid: If there is data available, it would be helpful to know what percentage of transit passengers now work remotely/telework and no longer utilize transit/rail. I assume there would be a greater number of people that utilized transit/rail in dense, urban areas, but less sure about those that live in suburban areas.
Suggested Action: Acquire available survey data on employment types and percentages of commuters that now work remotely, without a need to take work commute trips.
- Pg 139 - Section 3.10; Could the Interregional Transportation Strategic Plan be included as a State guidance document?

Suggested Action: Acquire available survey data on employment types and percentages of commuters that now work remotely, without a need to take work commute trips.

- Pg 152 - Suggestion is to include a graph that would project Pedestrian Fatalities and Serious Injuries if actions weren't taken.
- Pg 153-155 - If the outcome is to reduce speed limits to increase chance of survival for vehicle and pedestrian collision, how will this impact travel times? Suggestion would be (if possible) include a graph that shows impact to travel times and speed limit reductions (per area)
- Pg 155 (3.12.3) - Provide graph that shows injuries in areas that lack infrastructure.
- Pg 157 - If available, provide graph showing an increase/decrease collision related data involving motor vehicles. Is the increase/decrease due to Micromobility options such as e-scooters/bikes? Besides allowing access, what are other benefits to the community/ region.
- Pg 162 - Provide graph illustrating survey results and Planning Priorities for the next 20+ years.
- Pg 163 - Goals listed support CAPTI
- Pg 166-171 - Provide detail that shows area of travel for the proposed network. (Type of road, condition, area, lighting, etc.)
- Pg 172 - Nearly half of all jurisdictions have adopted a Complete Streets policies and strategies through their general plan.
- Pg 174 - When widening sidewalks, is there a standard to the minimum width of a bike lane, parking lane, and street lane? The first paragraph calls for the widening of sidewalks. But default will this also shift all infrastructure creating less space for vehicles? Is there a study being included to ensure the projects (Complete Streets) aren't becoming confined spaces.
- Pg 177 - Paragraph two mentions shifting short trips to walking modes. In areas where suggested, shade canopies (trees) should be included in the designs
- Pg 178 - Paragraph one mentions the removal of vehicle lanes. Has or is a study projected to be completed to show traffic impacts with the removal of vehicle lanes.
- Pg 178 - Paragraph two mentions local jurisdictions can pursue implementing "Slow Streets". It is mentioned "Quick Builds" may be part of the process when determining, but what is the deciding factor.
- Pg 183, Section 3.16 - How will SCAG Support? - Outreach was done earlier to prioritize planning projects. But prior to carrying out the projects, will SCAG, the Local Agency, and Caltrans work together to begin to prioritize projects to be implemented.
- General Comment - After reviewing the Active Transportation (Chapter 3) section of the SoCal Mobility report, there were no suggested recommendations. As shared, the previous part was strictly the history, definitions/examples, and plans and projects that were either completed or underway. Further into the document it began to address what the issue was, examples of projects that can assist the Local Agency/region on combating the issue, and what SCAG role will be throughout the process. The only suggestion I that could be beneficial would be for SCAG to adopt the 8-Step Corridor Planning Process.
- Appendix 4 - It would be helpful to provide frequency of monitoring plan goals, or a schedule on how to ensure strategies are being effectively implemented by each responsible party in the connect SOCAL 2024 plan.

Suggested Action: Provide "quality management plans" by each responsible party on how they plan to achieve plan goals and deliver strategies to achieve the greater RTP/MTP goals

Comments on Demographics and Growth Forecast Technical Report

- Pg 7 - Table 2: Would be helpful to know how the employment changes are distributed across different labor categories.

- Pg 11 - Table 3: For the county-to-county migrations expected to occur, are there ongoing regional efforts to respond to the changes in population/households/employments within the SCAG region? Are there enough jobs in different categories available for new migrants into the SCAG counties?

Comments on Project List Technical Report

- Pg 411 - The High Desert Corridor Operational Efficiency project is planned to be submitted for TCEP funds, SB 1 Cycle 4 and is listed in the draft Connect SoCal 2024.
Suggested Action: Please make sure project (RTP ID 5240011) is also included in the final version of the Connect SoCal 2024.
- Pg 265 - The Pennsylvania Avenue Grade Separation project is planned to be submitted for TCEP funds, SB 1 Cycle 4 and is listed in the draft Connect SoCal 2024.
Suggested Action: Please make sure project (RTP ID RIV180129) is also included in the final version of the Connect SoCal 2024.
- Pg 110 - The Scott Road/Bundy Canyon Road Widening project is planned to be submitted for TCEP funds, SB 1 Cycle 4 and is listed in the draft Connect SoCal 2024.
Suggested Action: Please make sure project (RTP ID RIV180140) is also included in the final version of the Connect SoCal 2024.
- Pg 120 - The McCall Boulevard/I-215 Interchange project was submitted for TCEP funds, SB 1 Cycle 4 and is listed in the draft Connect SoCal 2024.
Suggested Action: Please make sure project (RTP ID RIV151218) is also included in the final version of the Connect SoCal 2024.
- Pg 410 - The Desert Rail Infrastructure Improvement project is planned to be submitted for TCEP funds, SB 1 Cycle 4 and is listed in the draft Connect SoCal 2024.
Suggested Action: Please make sure project (RTP ID 5240010) is also included in the final version of the Connect SoCal 2024.
- Pg 146 - The Autonomous, Zero-Emission Transit Tunnel to Ontario International Airport project is planned to be submitted for SCCP funds, SB 1 Cycle 4 and is listed in the draft Connect SoCal 2024.
Suggested Action: Please make sure project (RTP ID 20192702) is also included in the final version of the Connect SoCal 2024.
- General Comment - We recommend to include in the final document all potential projects nominated for SB1 program by Caltrans and local agencies.
Suggested Action: Please make sure to include in the final document all potential projects nominated for SB1 program by Caltrans and local agencies.

Caltrans District 7

District 7 Climate Change Adaptation

General Comments on Draft Connect SoCal 2024

1. We'd like to commend SCAG's RTP for providing a comprehensive overview of the conditions and challenges facing the region. The RTP also provides an extensive list of resources for local agencies and partners to use. The Sustainable Communities list can help inspire ideas from other agencies to develop their own applications and projects.
2. We'd like to commend SCAG's RTP for highlighting the Digital Divide, especially for low-income households in the community. The digital divide creates unequal access to opportunities for these households. For example, lack of internet access can not only limit viability to certain jobs that are hybrid/telework, forcing them to physically travel to work leading to increased transportation costs for households and regional emissions. It can also limit informational access to warnings regarding climate hazards and extreme weather events. Caltrans is helping the State and Region bridge the Digital Divide through Digital Equity Workshops and installation of fiber optics through and along State Facilities.
3. Section 2 covers both Environment and Economy. It would be great to provide a small paragraph that showcases how much the money the Region could save by investing in Resilient infrastructure instead of letting the Climate Hazards occur and damage infrastructure/communities.

District 7 Multi-Modal System Planning

Comments on Draft Connect SoCal 2024

Chapter 1: Executive Summary

- Pg 8 (Accessible) - Safety has become a deterrent to ridership. Conflicting local policies are part of the problem and need to be addressed.
- Pg 9 (Mobility) - Transit ridership continues to decline despite billions of dollars in investment. A large part of the plan is for investment in transit when it accounts for only a small fraction of trips.
- Pg 9 (Mobility) - EV's weigh more than gasoline powered vehicles thus doing more damage to roads. They should be taxed accordingly, including at the charging station.
- Pg 10 (Economy) - Ironically, high income areas often have poorer access to transit because of their lower-density nature. Lower income areas often have better transit access due to higher density and ridership productivity.

Chapter 2: Our Region Today

- Pg 34 (Shared Mobility) - Ride sharing services may have also impacted transit ridership. They can be a more attractive option in off-peak hours.
- Pg 34 (ITS – real-time traveler info systems) - These systems are very helpful to transit riders.
- Pg 34 (Blockchain) - Not sure how much different this is than using credit cards and digital wallets?
- Pg 34 (Innovative Clean Transit Rule) - Is this an unfunded mandate that will make it more difficult to provide transit service?
- Pg 34 (Advanced Clean Cars II rule) - ZEV's cost significantly more than other vehicles. Wouldn't this requirement have a negative impact on low-income communities?
- Pg 35 (seismic events) - How are earthquakes related to climate change?
- Pg 38 (How do we move today?) - How many miles of freeways?

- Pg 38 (100 transit operators) - Metropolitan Chicago has three transit operators. 100 is far too many to be effective and impossible to coordinate.
- Pg 38 (109 miles of light rail) - How many miles of heavy rail (B and D Lines)?
- Pg 38 (locally supported sales-tax) - The rail network also relies on state and federal funds
- Pg 43 (Transportation Safety – regional housing crisis) - This is not the only cause. Mental illness and substance abuse are probably a larger factor for security issues on transit. Almost all incidents are caused by people who do not pay their fare, so fare enforcement would be a start.
- Pg 43 (homelessness on transit) - Conflicting local policies and priorities are another problem. Transit and other public spaces should have rules of conduct and trespassing laws that are enforced. Other regions around the country seem to have less of a problem with these issues.
- Pg 43 (66% of fatalities on 1.5% of network) - Might be interesting to see on a map
- Pg 44 (A Just and Clean Transition) - These are very significant barriers. Incentives and market choices might work better than mandates.
- Pg 55 (“primary factors leading to homelessness”) – What is social?
- Pg 60 (Regulatory Requirements) - Conflicting goals. Incentives might be better for business than mandates.
- Pg 66 – (“Redlands University”) – University of Redlands
- Pg 66 (Metro E Line) – (Gold)
- Pg 66 (“downtown LA and Santa Monica”) – East L.A. and Santa Monica
- Pg 68 (“retroreflective backplates and LPI”) – Referring to traffic signals?

Chapter 3: The Plan

- Pg 89 (Technology Integration) – Telecommuting?
- Pg 89 (Safety) - Other local public safety polices might conflict or interfere with this goal
- Pg 89 (Funding the System) - Per kw tax at the charger or vehicle license fee surcharge for hybrids and ZEVs?
- Pg 93 (Metrolink SCORE Buildout) - Regional rail has been a missing, but vital element in the Regional Transportation System.
- Pg 95 (Regional Express Lane Network) - Looks like there are still some significant gaps
- Pg 97 (Forecasted Regional Development Pattern) - The scattered nature of ADU's seem to conflict with the PDA's and 15-Minute Community goals.
- Pg 100 (Priority Development Areas) - Looking at maps 3.3 and 3.4, some of the PDA's appear to be located in areas without good transit access and other infrastructure to support such growth.
- Pg 101 (Transit Priority Areas) - 15-minute all-day frequency would probably be a better requirement to support a TPA.
- Pg 109 (Advanced Clean Cars II regulation) - This goal may be too aggressive and may need to be extended to let the market and infrastructure catch up.
- Pg 109 (“higher price of electric vehicles...”) - Conflict of goals? More expensive transportation could make it harder for disadvantaged communities to access jobs and other services.
- Pg 115 (Policy 13) - Add Regional Rail (SCORE Program)? Much has been invested in urban light rail and subway lines, but the regional rail system has not been developed. Much of it still operates on single track, which limits service frequency and reliability.
- Pg 121 (Policy 82) - Cash payment options be maintained

- Pg 121 (Policy 83) - Reduce barriers, regulations, requirements and taxes that discourage businesses from locating in or remaining in the region.
- Pg 125 ("Expand the region's Express Lanes network...") - Include transition of Commuter Rail to frequent Regional Rail service. No mention of eliminating single track bottlenecks or SCORE program.
- Pg 128 (Coordinate with local, regional....") - Mileage based user fees do not account for weight and tax non-ZEV users twice. This has a negative impact on disadvantaged communities who frequently have to commute longer distances to affordable housing.
- Pg 128 ("Continue development and support for...") - Negative impact on lower-income workers who frequently do not have other options.
- Pg 128 ("Continue to coordinate with regional partners...") - Nothing about support for Regional Rail (SCORE)?
- Pg 130 ("Develop an agency-wide CBO Partnering...") - Provide oversight of non-profit and CBO contracts
- Pg 132 ("Facilitate development of EV charging...") - Add rapid charging to existing gas stations infrastructure?
- Pg 132 ("Assist local jurisdictions in developing...") - Consumers can decide what makes sense for them through the market.
- Pg 132 ("Support the development of clean transit...") - Is funding provided for additional cost

Chapter 4: Financial Summary

- Pg 141 ("SCAG further considers...") - A simpler way to address equity concerns is to not implement user fees and complicated redistribution schemes.
- Pg 144 (Figure 4.3) - What happens to projections if we have a longer period of high inflation, similar to 1970's ?
- Pg 146 ("Excise taxes on gasoline...") - Tax hybrids and ZEVs at registration or "at the charger."
- Pg 152 ("These sources include") - Seems incredibly optimistic. Several of these measures are extremely controversial.
- Pg 157 ("...implementation of road user charges...") - Highly speculative. Additional alternatives should have been identified.
- Pg 171 (Table 4.5.2) - Will there be public support tax increases and user fees to pay for transit when the mode share is so low?

Supplementals

- Pg 199 through 222 - Very useful section.

District 7 Freight Planning

Comments on Draft Connect SoCal 2024

- **Page 10. Economy.** Although it is noted that SCAG will "...[support] workforce development opportunities—particularly around the deployment of clean technologies..." would suggest adding reference to SCAG explicitly supporting and advocating for an equity-based approach to implementation of zero emission technology in all aspects of goods movement and the supply chain.
- **Pages 34,35. Clean Energy Transition.** Suggest adding reference to the Warehouse Indirect Source Rule 2305.

- **Page 39. Map 2.1.** Regarding the “Top 100 Bottlenecks,” could clarification be provided as to whether they apply to HD trucks specifically, and/or identify which locations do apply to HD trucks in particular, and perhaps to MD trucks as well?
- **Page 60. Goods Movement.** Recommend incorporating a reference to rail.
- **Page 61. Map 2.8.** If possible, suggest adding a table that identifies the names of the airports, ports, ports of entry, and the names and general locations of the intermodal facilities and classification facilities, immediately following the map.
- **Page 63. Data collection, analysis and research.** If the studies listed is limited to those completed in the last four years suggest that be mentioned.
- **Page 132. Clean Transportation (continued), first row, Other Responsible Parties.** Suggest adding CTCs, federal and state agencies.
- **Page 134. Economy. Strategy. Goods Movement, second row, Other Responsible Parties.** Suggest adding CTCs, Caltrans, federal and state agencies, and partner agencies.
- **Page 134. Economy. Strategy. Goods Movement, third row, Other Responsible Parties.** Suggest adding Caltrans, federal and state agencies.
- **Page 134. Economy. Strategy. Goods Movement, sixth row, Other Responsible Parties.** Suggest adding CTCs, Caltrans.
- **Page 178. Less Time Spent Driving. Heavy Duty Truck Delay. Page 180 Table 5.1 Truck Delay by Facility Type.** How were the identified percentage reductions in Heavy Duty Truck Delay on highways and arterials determined? How will they be achieved?

Comments on Aviation Airport Ground Access Technical Report

- **Page 16. Map 1.** “March” is identified as “March Inland Port (MIP) in the Goods Movement Technical Report. For consistency, suggest the facility be referenced as March Inland Port on this map. NOTE: MIP was not included in Section 3.1. If MIP is operational and data is available, recommend including comparable information regarding MIP in this section.
- **Page 20. LAX Ground Access Improvements. Second paragraph.** If any details regarding what improvements will be constructed in conjunction with the “LAX Cargo Modernization Program” can be provided, recommend including.
- **Page 21. LAX Operational Breakdown.** If available, suggest including information regarding truck traffic volumes (and type, LD, MD, HD) related to air cargo activity at LAX (in greater detail than the information provided in Table 5 on page 39 and Table 7 on page 67).
- **Page 26. Figure 2.** San Bernadino International Airport and March Inland Port are not included. Are these two facilities not considered part of the “Transportation Hub Ecosystem” being illustrated?
- **Pages 51,62. Figure 21, Figure 23.** Both figures appear to be presenting the same information.
- **Pages 71,72. Table 8, Table 9.** Are any of the projects identified in Table 8 and Table 9 related to the “LAX Cargo Modernization Program?” If not, is it known if any project(s) related to the “LAX Cargo Modernization Program?” will be added to SCAG’s RTP during the next four years?
- **Page 74. Section 6.2.2.** Is SCAG planning any analysis efforts specific truck traffic volumes—and most frequent travel patterns, specific to LD, MD, HD trucks, as pertains to air cargo activity at LAX, ONT, or any of the other airports in the SCAG region?

Comments on Goods Movement Technical Report

1. **General.** The sources identified for most figures and tables do not include dates. Could date information be added?
2. **General.** It is noted that the footnotes are presented in a roman numeral format. Suggest changing to regular numeric.
3. **Page 1.** Recommend adding the year of the document referenced for the California Freight Mobility Plan, California State Rail Plan and for all of the SCAG study efforts (The Last Mile Freight Program, Zero Emission Truck Infrastructure Study, Goods Movement Communities Opportunities Assessment, Curb Space Management Study, Integrated Passenger and Freight Rail Forecast Study, Last Mile Freight Delivery Study, and Industrial Warehouse Study).
4. **Page 2. Key take aways--third bullet.** 2 billion square feet, which county has most? Fifth bullet: Is the Barstow International Gateway already built? UP's Inland Empire Intermodal Terminal?
5. **Page 2. Last bullet.** The last sentence appears to be incomplete.
6. **Page 3. Figure 1.** The "Marine" truck icon gives the impression of drayage trucks being smaller than class 8 HD trucks. Recommend making "Marine" trucks closer to the same size as "Domestic" trucks, keeping the colors different to distinguish between "Marine" and "Domestic." Is the "Near/Off-Dock Rail Yard" to be understood to represent rail-truck intermodal facilities (such as BNSF's Hobart Yard facility and UPRR's Intermodal Container Transfer Facility), which are shown on Map 1? Would not the "Outside of the Region Direct Rail (On-Dock) goods movement pattern include a rail-truck intermodal facility step?
7. **Page 4. First paragraph.** Including any quantitative context regarding rail's role in freight movement within and out of the region would be helpful.
8. **Page 6. Second paragraph.** Suggest changing "By SCAG serving as..." to "As the SCAG area represents..."
9. **Page 6. Figure 3.** The one entry identified on the horizontal axis for 2022 does not appear to provide a direct correlation to 8.1 trillion annually. Suggest changing the vertical axis to be annual, in billions (or trillions).
10. **Pages 7-9.** Would it be possible to include any correlations of the nationwide information presented to the SCAG area?
11. **Page 10. Figure 6.** Is "...1/..." (included as part of the source information) a typo?
12. **Page 13. First paragraph.** Suggest changing "...two ports..." to "...two seaports..." (if POLB has again supplanted NYNJ as second).
13. **Page 15.** Would it be possible to include any reason(s) as to why the SCAG region's growth rate and the State of California's growth rate has been notably less than the States with the highest growth?
14. **Pages 19,20. Bottom of page 19, top of page 20.** As not all on-road transportation to and from the ports utilize I-710 suggest revising, "On-road transportation to and from the ports utilizes Interstate 710 (I-710),..." to "A substantial portion of on-road transportation to and from SPBPs utilizes Interstate 710 (I-710),...."
15. **Page 25. Last paragraph.** "Many Class I railroads across North America are testing multiple locomotive technologies to transition towards zero-emission capabilities." If there are specific examples located in California, suggest including at least some summary information.
16. **Page 27. Section 2.2.4 First paragraph.** Suggest adding all types of retail and wholesale operations to the list of facilities reached via critical last mile connections.
17. **Page 29. Map 3.** For clarity, as it is not expected this document will be updated after 2024 RTP/SCS is adopted, could the specific date(s) of the referenced recent submittals to FHWA be identified. **NOTE:** This comment also applies to Table 3 on page 30.

18. **Page 30. First paragraph.** Suggest including an explanation as to why 2019 data is being used. **NOTE:** The sentence "More than 16,000 trucks per day travel on some sections these roadways." needs to be remedied.
19. **Pages 31,32. Figure 17.** Figure 17 (or the related discussion that follows) does not include reference to two airports shown on Map 1, one which appears to be near the Port of Hueneme, and another which appears to be near I-215 and I-10 (San Bernardino International Airport?). Why were those airports not included? In the discussion provided subsequently, the March Inland Port (MIP) is referenced to have begun operations with Amazon only as of 2018, does MIP handle even less total cargo tonnage than Palm Springs, John Wayne, Burbank, or Long Beach? Has Southern California Logistics Airport started any air cargo operations yet, whether with Amazon or any other company? San Bernardino International Airport is noted to have moved nearly the same amount in international trade including 669,428 tons of cargo (in 2022?).
20. **Page 37. Second new paragraph.** What is the source for "Goods movement, particularly heavy-duty trucks, contributes to 50 percent of NOX emissions and 18 percent of PM2.5 emissions in the region."? Is the region to be understood to be all six counties covered by SCAG?
21. **Pages 40,41. Bipartisan Infrastructure Law.** Would it be possible to include known or typical timeframes for when the identified programs are available to apply for, and who is eligible to apply, or include a link to a USDOT website that provides such information?
22. **Page 41. New Programs of Interest.** The Consolidated Rail Infrastructure and Safety Improvements (CRISI) Program and the Port Infrastructure Development Program (PIDP) are listed under "New Programs of Interest," however these programs started prior to IJA. RAISE was previously known as BUILD and before that it was known as TIGER.
23. **Pages 41,42. Inflation Reduction Act.** Would it be possible to include known or typical timeframes for when the identified programs are available to apply for, and who is eligible to apply, or include a link to a USDOT website that provides such information?
24. **Pages 46,47. CTC-TCEP.** The evaluation criteria for Transportation System Factors also includes "Zero-Emission Infrastructure." The evaluation criteria for Community Impacts is "Air Quality Impact, Community Engagement, and Economic Impact." The last five bullets do not appear to fully correlate with the "Other Factors, Including" content in Section 18 of the 2022 Trade Corridor Enhancement Program Guidelines.
25. **Pages 47,48. CTC – Senate Bill 671 Clean Freight Corridor Efficiency Assessment.** Although not officially adopted until the CTC's meeting on December 6th and 7th, the circulation of the draft was announced at the CTC's October 18th-19th meeting. Recommend revising the content for this section to at least recognize that the assessment was adopted by the CTC at its meeting on December 6th and 7th, and to the extent feasible, cross-reference with the adopted version of the Assessment to ensure the content included in the discussion on this topic in the Goods Movement Technical Report is consistent with the adopted SB 671 Assessment.
26. **Page 48. Caltrans/CEC – Charging and Fueling Infrastructure Grant Program.** The discussion provided does not make clear that while the funding opportunity is being pursued, an announcement has not yet occurred so it is unknown if it will be possible to implement what is summarized.
27. **Page 48. GO-Biz – Critical Minerals in California.** The discussion provided includes no information regarding equity considerations and/or environmental impacts.
28. **Pages 50,51. Table 4.** The table does not include Rule 2305-The Warehouse Indirect Source Rule. Although it is noted that there is some discussion of this rule in Section 3.2 based on what is included in Table 4 it would seem logical to include Rule 2305.

29. **Page 52. Section 3.2 First paragraph.** Would it be possible to include any current target dates associated with completing the indirect source rule efforts for commercial marine ports and rail yards and intermodal facilities?
30. **Page 52. Section 3.2 Second paragraph.** What is the date of the City of Los Angeles' "Green New Deal Plan?"
31. **Page 52. Clean Air Action Plan.** According to a FAQ/Fact Sheet prepared by the Port of Long Beach the Clean Truck Fund (CTF) rate is \$10 per twenty-foot equivalent unit (TEU) for loaded containers, \$20 for containers longer than 20 feet. Beneficial Cargo Owners or their authorized agent are responsible for paying the CTF rate. Each port's tariff includes a provision prohibiting the CTF rate being paid by truck drivers. The CTF rate will end on January 1, 2035, but that may be subject to change. The focus of the funds collected the first year was to assist with purchasing zero emission HD trucks that service the two ports. In the second year the focus broadened to include supporting implementation of zero-emission refueling infrastructure for HD trucks that service the two ports. There are exemptions to the CTF rate that vary between the two ports.
32. **Page 53. The Los Angeles County Metropolitan Transportation Authority (LA Metro) I-710 Clean Truck Program.** When did coordination with Metro regarding this information last occur?
33. **Pages 54,55. Last Mile Freight Program.** If any other agencies besides SCAG and MSRC were involved, recommend identifying. Suggest including the performance metrics that will be used and the date(s) when results are anticipated.
34. **Page 55. Zero Emission Truck Infrastructure Study.** Suggest including the date(s) when results are anticipated.
35. **Page 56. Curb Space Management. Second Paragraph.** Curb Management and Integrated Strategies to Catalyze Market Adoption of Electric Vehicles under the United States Department of Energy's (DOE) Vehicle Technologies Office Fiscal Year 2021 Research Funding Opportunity. Suggest including the performance metrics that will be used and the date(s) when results are anticipated.
36. **Page 57. Supply Chain Analysis.** It would be helpful if the dates of the "Comprehensive Regional Goods Movement Plan and Implementation Strategy (On the Move)" and the "Industrial Warehouse Study" could be identified.
37. **Page 60. Section 4.1.** Recommend defining the difference between the SCAG area and Southern California.
38. **Page 62. Paragraph following Figure 24.** Typo. "...not knit..." should be "...knit...."
39. **Page 64. Figure 26.** The purpose of the green diagonal line shown does not appear to be explained in the discussion.
40. **Page 66. Figure 28.** What does LTM (beneath the last column on the right) mean?
41. **Page 70. End of first paragraph.** 1.4 billion or 1.4 trillion?
42. **Pages 70,71,74,75. Last-Mile Freight and Curb Space Management.** The information provided is limited. If there are results from specific case studies, or any other particulars associated with known efforts to address this challenge, recommend including.
43. **Page 75. 4.4 Emerging Technologies and Advancements.** "To combat climate change and improve air quality, the state has implemented several regulatory rules aimed at accelerating the adoption of ZEVs and NZEVs." It is understood that a number of Governor's Executive Orders and CARB regulations have focused on accelerating adoption of ZEVs. Which regulation(s) have aimed at accelerating the adoption of NZEVs? **NOTE:** The sentence "Given the heavy investment in zero-emissions technologies by the State and their potential for improving environmental and public health, these technologies, including battery electric and hydrogen options." does not appear to be a completed sentence.
44. **Page 75. Section 4.4 Second paragraph.** Is "SCAG's goods movement system..." to be understood to mean the goods movement system within the SCAG area? Is the ensuing discussion applicable to all

- parts of the SCAG area to the same degree or is this discussion more applicable to some parts of the SCAG area than others? If it is more applicable to certain parts of the SCAG area, could these areas be identified?
45. **Page 76. Last paragraph.** "Approval from the Biden administration would be required for the standards to move forward." Approval by an agency? US EPA? Recommend clarification.
 46. **Page 77. 4.4.2 Air Cargo Facilities and Advanced Air Mobility.** Is it known how much LAWA's June 2023 approved \$500,000 related to the LAX Electric Ground Support Equipment Incentive Program will reduce emissions?
 47. **Pages 80,81. 4.4.6 Tube-Based Cargo Transportation.** The discussion provided does not include any cost information and also does not appear to identify challenges/considerations associated with this technology, which was included in other emerging technology discussions. Additionally, if there have been any tube-based cargo transportation effort(s), perhaps a summary of those effort(s) should be included?
 48. **Page 87. First paragraph.** "There are numerous areas within Southern California including San Bernardino County and the Salton Sea..." might be interpreted to suggest that the Salton Sea is in San Bernardino County.
 49. **Page 89. Last paragraph.** While the statement "Multiple state agencies including CARB, the CEC, CPUC, and CTC via SB 671 continue to assess and quantify wide-scale cost implications, grid capacity, and other impacts from the infrastructure side for zero emission targets." is correct it does not capture the broader range of public agencies, private sector companies, and non-profits also engaging to figure out these challenges.
 50. **Page 90. Figure 36.** If feasible, suggest numbering the facilities shown in Figure 36 and following the figure with a table identifying at least the names of each of the facilities.
 51. **Page 91. 5.3 Highway and Roadway Congestion and Delay.** "Truck traffic in the region is expected to grow at a very high rate, much higher than auto traffic, and will use an increasing share of the region's highway facilities." Is the very high growth rate of truck traffic across all areas within the SCAG region, or only in certain areas. If specific to certain areas, could this be identified? Will the truck traffic increase substantially for all classes of trucks (LD, MD, HD), or will there be variations amongst the classes of trucks? Does the expected high growth rate in truck traffic have any particular correlation to the implementation of zero emission technology? Does the expected high growth rate in truck traffic have any correlation to particular goods movement trends?
 52. **Pages 92,93. Map 4.** Recommend specifically identifying the name of the 2050 Plan and the 2050 Baseline in the Map title and in the legend. **NOTE:** Recommend including an explanation of the difference between 2050 Plan and 2050 Baseline in the discussion provided following Map 4.
 53. **Pages 94-99. Maps 5, 6, 7, 8, 9, 10.** SR-58, US-395, part of SR-126, SR-86 and SR-111 do not appear to be included. Why not? There are notable truck volumes on all of these routes.
 54. **Page 100. 5.4 Freight Corridor Bottleneck Analysis.** If the 2019 Caltrans AADTT data was used (instead of another year) due to the impacts the pandemic had on traffic volumes it is recommended that this be explained.
 55. **Page 101.** Content limited to a single incomplete sentence.
 56. **Pages 102,103. Table 8.** What is the basis of the order of bottlenecks listed in this table? If there is no specific basis for the order, would it be possible to list either by order of route--smallest highway number to highest, or by county (alphabetically) and the routes for each county listed in order (smallest highway number to highest)?
 57. **Pages 104,105. Map 11, Table 9.** In Table 9 Is US-1 meant to be SR-1. Additionally, Map 11 does not appear to show a SR-1 shield anywhere. Routes SR-86, SR-74, US-395, and SR-18 are all identified as having (at least in some portions) HDT annual vehicle hours of delays over 20,000 but there are no

portions of those routes as shown on Map 11 that are marked in either yellow or red. **NOTE:** Would it be possible to identify the post mile segment(s) associated with the annual vehicle hours of delays shown?

58. **Pages 105,106. Last bullet.** The information provided in Table 9 is understood to be a presentation of annual vehicle hours of delays associated with particular (portions?) of the routes listed. The table does not appear to include specific interchange locations such as SR-57/SR-60. Where is the "...112,450 AVHD in 2019 accounting for 3 percent of total regional HDT delay..." shown in Table 9? **NOTE:** Same question regarding the reference to Table 9 made in the third bullet on page 106.
59. **Page 106. Last three bulleted items on page 106.** The third from last and second from last bullet each reference a "...fifth most congested bottleneck..." location. The I-215/University Avenue location's 73,400 AVHD appears to be substantially more than the I-5/I-605's 60,200 AVHD. Does the text in the last bullet include both of the "...fifth most..." locations?
60. **Page 106. First paragraph.** "Error! Reference source not found.."
61. **Page 106. 5.5 Truck Parking.** Though not explicitly stated, is all discussion in this regard focused specifically on HD trucks?
62. **Page 107. First new paragraph.** Please identify the date of the referenced "...California's most recent Jason's Law survey are shown in Table 10." in the narrative discussion.
63. **Pages 107,108. Last paragraph page 107, first paragraph page 108.** The discussion appears to be indicating that there is a decreasing supply of public truck parking due to location closures or diminished capacity. How was this determined? Over what timeframe?
64. **Page 109. Map 12.** Could a different color be used for private and public facilities? If feasible, suggest numbering the facilities shown in Map 12 and following the map with a table identifying at least the names of each of the facilities, and indicating whether public or private.
65. **Pages 110,111.** Will it be possible for SCAG member agencies to receive any more detailed information generated from the truck parking analysis, specific to certain geographic locations? This information could help with analysis efforts focused on where it might be possible to establish additional parking for HD trucks. Additionally, recommend identifying the truck classes/weights associated with MD and HD truck parking information shown on Map 13. **NOTE:** "Map 13" is inserted following the end of the second paragraph.
66. **Page 114. Figure 37.** As the costs of new vehicles will likely continue to fluctuate it is recommended that the year of the source information for this figure be included as part of the source information.
67. **Pages 116-121. Maps 14-19.** The source information for the maps indicates 2022 but the summary information provided on page 115 referenced 2019, is the collision density information shown approximately the same as summarized for 2019 or is it different? Is the collision density information shown limited to the state highway system? Is it for HD trucks only or does it include MD or MD and LD trucks as well? Is there information about the causes of the collisions shown?
68. **Page 123. Last paragraph.** The first sentence appears to indicate that the pandemic began in 2019. In terms of economic impacts were there any economic impacts in the US before the first quarter of 2020?
69. **Pages 132,134. Map 20, Map 21.** Are these maps showing the location of new projects (whether passenger rail or freight rail)? If so, suggest identifying the new projects more clearly. **NOTE:** Although there is some discussion on page 154 which references these two maps, some explanation of the content on these maps on pages 131 or 133 would be helpful.
70. **Page 136. Figure 40.** What is meant by "Freight Passive (1)" and "Freight Passive (2)?" There does not appear to be any discussion explaining Figure 40.
71. **Page 136. First paragraph.** "Long Beach – East Los Angeles Corridor Plan" should be "Long Beach – East Los Angeles Corridor Investment Plan."

72. **Page 138. First bullet.** Caltrans would appreciate being able to have multiple personnel be members of the Southern California Technical Advisory Committee for the Comprehensive Goods Movement Plan update.
73. **Page 140. Second bullet.** Recommend identifying Port of Long Beach with this project.
74. **Pages 141-144. Table 11.** Recommend clearly indicating, either in the "Project Title" field or in the "Project Description" field, which port is sponsoring/implementing the project.
75. **Page 145. Second paragraph.** 3 percent?
76. **Page 146.** Recommend identifying which agency is associated with the first three bulleted projects.
77. **Page 147. Map 22.** Suggest including a reference to Table 15, before or after this map, to let readers know where project name and location information is for "E.1-LA," "F.4-LA," "F.1-LB" etc.
78. **Page 148.** Recommend identifying the implementing agency for all of the bulleted projects (in the first and last sets of bullets) where this information is not already provided.
79. **Pages 149-151. Table 12.** Recommend clearly indicating, either in the "Project Title" field or in the "Project Description" field, which agency is sponsoring/implementing the project.
80. **Page 154. Bulleted items.** Are the various improvements listed under "Short-Term Main Line Improvements," "SCORE Program," and "Additional Freight and Rail Enhancements" as bullets all included in the 2024 RTP project list? If so, recommend adding some summary information in this regard including clarification if any of the bulleted items represent bundles of specific projects, whether in the RTP or otherwise.
81. **Page 155.** Suggest indicating if all of the bulleted projects identified on page 155 are in the 2024 RTP project list, or if all are not, indicating which projects are.
82. **Page 156. Map 23.** Are the "Planned" and "Under Construction" identified grade separation project locations shown in the map all included in Table 15? If so, recommend including a reference to Table 15 before or after the map. If not recommend including a table following this map identifying the project name and location information.
83. **Pages 161,162. Last bullet on page 161.** Intermodal (IMX) Truck Trips, defined as "domestic intermodal truck trips that have origins or destinations at regional intermodal facilities in the SCAG region," are stipulated to "not include those that have either an origin or destination at the San Pedro Bay Ports as they were modeled by Port HDT Model." Does SCAG's HDT model not utilize or incorporate the Port HDT model? If not, suggest including information explaining how truck trips covered by the port HDT model are accounted for in the SCAG region.
84. **Page 162. First new paragraph.** "Error! Reference source not found.."
85. **Page 162. Table 14.** Is there information comparable to what is provided in Table 14 for the SPBPs, for the Port of Hueneme?
86. **Pages 163,164.** Bulleted list of "Short-Term Improvements," "Mid-Term Improvements," and "Long-Term Improvements." If the projects are not listed in any particular order, it is recommended that this be explained.
87. **Page 164. Long-Term Improvements.** Regarding the related discussion that follows on pages 166 through 168, if possible, recommend providing clarification as to what these improvements are currently anticipated to include if these scopes of work are anticipated to only be on the state highway system or if they are anticipated to include local roads as well. If local roads are anticipated to also be involved, suggest confirming if the improvements would be limited to identified truck routes, and also if the truck types would be HD only or MD and LD as well. **NOTE:** If possible, suggest including in the discussion that follows how these improvements align with State policies, such as CAPTI.
88. **Page 165. Map 24.** Suggest including a reference to Table 15, before or after this map, to let readers know where project name and location information is for "A.1," "A.2," "A.3" etc.

- 89. Page 166. Long Beach-East Los Angeles (LB-ELA) Corridor Mobility Investment Plan.** Recommend using the full formal name of the effort rather than "LB-ELA Corridor Plan" in the discussion provided under this section and putting "LB-ELA Corridor Plan" in parenthesis if it is intended to use "LB-ELA Corridor Plan" as a shortened reference. **NOTE1:** The Long Beach-East Los Angeles (LB-ELA) Corridor Mobility Investment Plan Task Force set up working groups (Community Engagement Strategy, Equity Working Group, and Zero-Emissions Truck Working Group) and the Community Leadership Council rather than committees. **NOTE 2:** The LA Metro Board approved adoption of the No Build Alternative as the locally preferred alternative at their May 2022 Board meeting. **NOTE3:** "...save..." should be "...safe...."
- 90. Pages 166,167. East-West Freight Corridor.** Caltrans would encourage and support more direct engagement with stakeholders in the course of revisiting the EWFC concept during the course of SCAG's Comprehensive Goods Movement Plan Update, perhaps including utilization of a Technical Advisory Committee.
- 91. Page 167. Zero Emission Vehicles and Infrastructure.** Recommend identifying the timeframe the \$5 billion in investments is needed, and how much has been secured to-date.
- 92. Page 167. ITS Strategy.** If possible, recommend providing more information about the DRAYFLEX program, such as extent of usage, performance to-date and any known future plans.
- 93. Page 169.** Suggest adding reference to the Port of Hueneme in the second paragraph.
- 94. Pages 170-190. Table 15.** If possible, suggest adding a column to this table to include the 2024 RTP project ID, for all of the projects that are included in the 2024 RTP project list.
- 95. Pages 191,192. Table 16.** If possible, suggest adding a column to this table to include the 2024 RTP project ID, for all of the projects that are included in the 2024 RTP project list.

District 7 Special Projects Office (Transportation Planning)

Comments on Draft Connect SoCal 2024

Overall, the thrust of the Connect SoCal 2024 RTP aligns with Caltrans' foundational principles of equity, climate action, safety, and economic prosperity. It is generally heading in a prudent direction. Comments below reflect areas of possible improvement to a good document.

- P 6. Recommend changing "mobility" to "access." Mobility is what we have tried to do by encouraging long distance travel with autos. It has cost us in reduced access to the destinations we need to reach – work, school, retail, recreation, medical, etc. We can travel for 2 hours to reach far away locations, but we will be better off if we can access places we need in short distances.
- P 12. Same comment
- P 22. Reducing congestion should not be a goal. Attempting to "solve congestion" usually means widening or expending highways. This just induces more auto travel. Even encouraging people to use transit, bike, and walk doesn't solve congestion. For every person we attract to these modes, it just provides another space for someone else to drive. It's called the "law of triple convergence." This observes that when roads get congested people will opt to:
 - Leave at another time that is less congested
 - Take different routes
 - Switch to other transportation modes

When we try to alleviate congestion with road widening, enhanced transit, better bicycle or walking facilities, people opt to return to:

- Leaving at their preferred time
- Taking their original route
- Solo driving

Thus, getting us back to the same congestion. The only strategy that works to reduce congestion is pricing. Again, access is what we are after. Not to say that we shouldn't enhance transit, add bikeways, or improve pedestrian facilities. We should improve these options to give people more choices. But we shouldn't expect growth in these modes to reduce congestion.

- P. 23 Same comment on Mobility as above.
- P. 38 Same comment on Mobility as above.
- P. 81 Do the population trends in Table 3.1 reflect recent drops in population? It is difficult to predict, but presently we are losing population.
- P. 92 Under "Regional Express Lanes Network". We should be aware that the way we converted HOV lanes to HOT lanes on the I-10 and I-110 freeways led to a consistent drop in HOVs. The devil is in the details and if we are going to add express lanes, we must manage them to favor high-occupancy modes. For example, directing a higher ratio of the revenue to bus-on-freeway transit. Further, the focus has been on pricing lanes that HOVs use. We should consider pricing the SOV lanes and providing financial incentives to HOVs.
- P. 94 The map doesn't show a network of regional bus transit system on our freeway network. This should be a central feature of this plan.
- P. 114 Same comment on Mobility as above.
- P. 114 This section should mention a regional bus transit system on our freeway network.
- P. 180 Same comment about Mobility as above. The goal isn't to maximize the distance people can travel. It is to ensure that people can conveniently reach the destinations they need to.

District 7 Division of Program and Project Management

PPM Financial Programming staff completed a thorough review of the SCAG report, including the Draft RTP Document, associated Technical Reports (including the Project List), and the 2023 Federal TIP Consistency Amendment# 23-26. Regarding Caltrans projects, the information is confirmed to align with our records and is up to date.

Caltrans District 8

District 8 Office of System Planning

Comments on Connect SoCal 2024

1. Page 82, Chapter 3 “The Plan”. “affirmative” is a charged word, seek alternatives.
2. Page 91, Chapter 3 “The Plan”. Maybe put the definition of Universal Basic Mobility in parenthesis. UBM isn't defined until page 38.
3. Page 97, Chapter 3 “The Plan”. “below 2005 levels”.... Perhaps put in the precise level? The sentence is too vague.
4. Page 99, Chapter 3 “The Plan”. Map on page 98 should not run to the top page, not aesthetically pleasing to the eye. Put in a margin. Also add in units next to numbers (ex. Greater than 500 households).
5. Page 100, Chapter 3 “The Plan”. “redevelop” Can do without the quotation marks.
6. Page 101, Chapter 3 “The Plan”.”a” versus “an”.... SOI into the city limits.... The article needs to be changed.

District 8 Office of Regional Planning

General Comments on Connect SoCal 2024

- Thank you for the opportunity to review Connect SoCal 2024. Overall, the document was well written and demonstrates SCAG’s continual commitment to leading long-range planning in the Southern California Region. The quality of the document, its appearance and maps that were provided continues to be of high quality. This type of quality document is consistent with what SCAG has consistently produced for many years.
- To produce the finest quality final public policy document, we believe it should be noted that the previous RTP/SCS, Connect SoCal 2020, anticipated we would have roughly another 3.5 million people in the Southern California region by the year 2045. Why this was true then wasn’t entirely clear because Connect SoCal 2020 noted that the region had lost 91,000 residents per year from 2014 to 2018 due to demographics and housing affordability issues. Since this discussion was in a section titled “Progress”, we wondered if the region had really progressed or was an abandonment trend that needed to be reversed beginning to occur?
- Connect SoCal 2024 anticipates that the region will grow by a much more modest 2 million people by 2050. Connect SoCal 2024 also notes (Page 8) that the region continued to lose population from 2019 to 2023. Between 2014-2023 the region has now experienced a ten-year population decline. So why this would reverse from 2024-2050 and the region would instead grow by almost 77,000 people per year from 2024 to 2050 (2 million new people/divided by 26 years) wasn’t made clear enough in the current draft of Connect SoCal 2024.
- Connect SoCal 2024 repeatedly notes demographics, and the shortage of affordable housing are still the likely cause of people leaving the region. But that neither SCAG or the RTP/SCS Plan itself has any ability to address this problem. Connect SoCal 2024 notes that SCAG has no land use or zoning authority to create regulations that will produce more housing. It’s also not apparent why the increasingly older trending population demographics that are expected in Southern California would support the development of more housing or the need for multi-billions in transportation improvements that are planned.

“Provide a safe and reliable transportation network that serves all people and respects the environment”

- The plan itself suggests priority development areas but doesn't focus on solutions to produce more housing. This was something we provided SCAG in our comments to the 2020 SoCal Connect Plan joint letter from the Caltrans Southern Districts. These suggestions could have served as regional planning policy guidance in the 2020 SoCal Connect Plan and the current 2024 SoCal Connect Plan. Instead, SCAG refers to its ability to support ongoing efforts that would drive efficiency in future local land use decisions, being a repository for data collection and making RTP/SCS plan supportive transportation improvement project selections that are part of Air Quality Conformity Determinations. SCAG made it clear it will limit itself to those areas going forward. Possibly this should be reconsidered and SCAG should have a larger role in shaping the region.
- The plan notes that Relieving Bottlenecks (Pages 39 and 114) is a goal of the region related to improvement of "Goods Movement" and "Moving People" but it's not clear that this would not be in conflict with Zero Emissions Goals (Economy in 2050 Page 112) and Air Quality Goals (Environment Page 118). Relieving bottlenecks is also not likely consistent with the regions efforts to address Vehicle Miles Travelled and Greenhouse Gas Emissions reductions (Section 5 "Measuring our Progress" Pages 8 and 16). It's not clear that this policy would meet Statewide goals identified in the CAPTI, the CTP 2050 and the Smart Mobility Framework related to Vehicle Miles Travelled and Greenhouse Gas Emissions.
- The Top 100 Bottlenecks in the region are identified on Page 39. It appears that eliminating these bottlenecks would require multi-billions of dollars in spending on Freeway widening. Based on our previous experience with Freeway widenings, we believe that such widenings would increase Greenhouse House Gas Emissions and Vehicle Miles Travelled and only provide limited temporary congestion relief due to latent travel demand. It's also not entirely clear that current levels of congestion or the related need for Freeway widening will be as necessary if population declines keep occurring going forward. Freeway widening may also undermine ongoing major resources being targeted to support a shift to other travel modes such as transit, biking, and walking.

Project Specific Comments on Connect SoCal 2024

- During review of the draft 2024 SoCal Connect SCS/RTP Project List the Reimagining and Reconnecting Route 66 project did not appear to be listed. Please verify if this project is included, or that it's not. If it's not on the Project List currently, please provide the steps that need to be completed to add it.

District 8 Active Transportation Branch

Comments on Mobility Technical Report

- In section 2.17.5, Mobility as a Service (MaaS), fare integration is cited as a key component to facilitate travel. While there is a mention of Cal-ITP, it would be beneficial for SCAG to take a greater lead in ensuring fare integration across county lines, across the SCAG six-county region, as well as potentially partner with the neighboring MPO, SANDAG.
- The current fare reciprocity structure underlies transit users starting from Metrolink to reach their destination, as a valid Metrolink ticket allows for free transfers to get to/ from stations. While that is beneficial for users who live and can commute (walk/ bike/ drive) to these train stations that are spaced miles apart, the user who starts from their home to get to a train station must bring a separate form of

payment (i.e. a “pocketful of change”) to utilize a bus to reach their transit station, or load up a different fare payment method for a personal mobility/ micro mobility vehicle (scooter or bicycle share) to get to a Metrolink station. In addition, there are multiple train stations along different Metrolink, as well as LA County Metro rail lines that charge for parking. These require a separate form of payment (i.e. digital wallet, cash, credit card) for each station, per mode and per county provider. Therefore, a casual or new transit user who begins their commute outside of Los Angeles County will need to bring their “pocketful of change” to pay for a bus or other transport form, then when transferring to another bus from a different provider, put more change into the farebox (since credit cards are not accepted for bus fare boxes), or use cash/ credit card to use Metrolink. Only when the transit user is in possession of a valid Metrolink ticket, they can reach their last mile transit provider without having to pay additionally, per Metrolink transfers to *most* local transit providers.

- While the San Francisco Bay Area falls under MTC/ ABAG, a 9-county region, the regional MPO ensured that the Clipper Card is the universally accepted payment media across county, city, and regional transit (bus/ rail) providers, as well as transit station and SFO airport parking. Previous to 2010’s Clipper Card introduction, MTC did not have the fare integration across county lines, as the earlier generation Translink card was not accepted by multiple transit agencies. Since the Clipper Card is accepted by 24 transit agencies across the nine-county San Francisco Bay Area region, it is possible to start and end a transit trip from a user’s home, using multiple (bus, rail) transit providers or transit station parking payment, to their destination and back, with multi-agency transfers, fare capping and other user-friendly cost savings, without needing to begin a trip with a “pocketful of change”.
- SCAG should strive to achieve transit and vehicle parking user integration in order to remove confusion with different mobility “wallets”, especially given the push for a universal basic mobility wallet that is being utilized in some Los Angeles County jurisdictions.
- In Section 3, Active Transportation, first and last mile should cover more than existing transportation networks. It has been generally acknowledged by state and federal agencies that the development of the National Highway System/ Interstate Freeway System led to divisions across communities, especially among areas of low income and racial makeup. In more urbanized areas, accommodations for bicyclists and pedestrians in the form of pedestrian overcrossings (POC) and pedestrian undercrossings (PUC) were constructed. District 7 has over 150 POCs and PUCs; District 8 has only 4 POCs and 3 PUCs and District 12 has 13 POCs and 2 PUCs. In addition, freeway interchanges and bridges are much closer together in the urban areas (especially in District 7), limiting the impact of divided communities, as opposed to typically one mile (or greater) separation between bridge structures or interchanges in less dense areas. Combined with existing railroad infrastructure, these adversely impact vulnerable road users, especially schoolchildren who live on one side of a freeway or railroad track that are enrolled in a school on the other side of the freeway or railroad track, greatly increasing their walking or bicycling distance.
- This section should expand upon added distances that schoolchildren, transit users and other non-drivers must traverse to cross a transportation barrier in order to get to their home or school. In addition, street network gaps (i.e. walking and biking distances to cross a transportation-caused barrier) should be taken into consideration for future development of local networks (bikeway, sidewalk, road). The USDOT Reconnecting Communities and Neighborhoods grant funding opportunities exist to help address previous decisions/ transportation projects that adversely affected the mobility of communities along or across transportation infrastructure.

Comments on Equity Analysis Technical Report

- Pertaining to Priority Equity Communities (PEC); SCAG acknowledges that there are multiple equity area definitions, such as SB 535 DAC, Climate and Economic Justice Screening Tool (Federal - Council on Environmental Quality), Free and Reduced Priced Meals and others mentioned in the Executive Summary. However, there is not a mention of the reasons that led SCAG to create a “new” regional equity area definition when other definitions and data already exist on regional, state and federal levels.
- Federal and state grant programs require the applicant to identify whether the location of the proposed project will lie within a disadvantaged community. Though it is permissible to use a local/ regional equity area definition, this leads to a confusion of different available equity area definitions already in existence and SCAG’s PEC is just another one to add to a disadvantaged community definition. With multiple local and regional definitions already invented and used by other agencies across the SoCal districts, what would be the appropriate definition that will be accepted by the different grant issuers, and how will these locally or regionally defined equity area definitions, such as SCAG’s PEC be viewed and fairly evaluated when such applications are scored, should the applicant use SCAG’s PEC (or other local/ regional equity area definitions) in the application?
- In Section 4.2, there is a mention that PEC builds off previous efforts, including Transportation Equity Zones (TEZ). There’s a likeliness that TEZ data, being from past efforts, may become or already be dated, given changing economic, housing and transit conditions and levels of service. Variables such as transit agencies making service modifications (i.e. service hour and frequency cuts during the COVID-19 public health manifestation) affects transit dependent populations and vulnerable road users much more adversely in less densely populated areas than in urban areas. This is due to lack of sufficient headways on corridors that lack redundant transit options. In areas that receive 5311 FTA rural transit funding, including the majority of transit agencies operating in District 8 (as opposed to two in District 7 or none in District 12) run headways of equal or greater than 60 minutes. From an equitable standpoint, a level of minimum transit service reaches more per capita in urban areas, with transit being merely one example.
- Furthermore, there are other variables that affect the population. The graphic (that neither is referred to as a figure or table) between Table 3 and Figure 1 on Page 22 (PDF page 24) provides the population criteria that feeds into whether a census tract is designated as a PEC. Zero of these criteria include air pollution, which is far higher in the inland regions, as much of the air remains stagnant, bounded by the mountains that surround the region. Other equity area definitions include air quality in their criteria. Referring to Figure 1, given that the technical document specifically mentions (elsewhere) that Orange County population tends to have less residents commuting outside of the county for employment and generally greater vehicle and transit access than other counties, the percentage of those living in a PEC seems unusually high, with the inland counties being unusually low. In addition, the population density of Orange County is much higher than most of the other counties within the SCAG region and therefore it is peculiar that so many of the population resides in a PEC.
- In Sections 5 and 6, it may be useful to break down the demographic data by county within the tables, since each county’s population does not have an equal composition of race and ethnicity, as well as socioeconomic data.

- Section 8 elaborates differences between census tracts that are designated PEC and non PEC, however these results appear to be based on factors from the population criteria, but without using any environmental criteria (see the graphic that neither is referred to as a figure or table between Table 3 and Figure 1 on Page 22/ PDF page 24).

Caltrans District 11

District 11, Various Offices

Comments on Project List Technical Report

It is recommended to make the following changes to the Project List Technical Report:

- Page 163 - Suggesting a revision to the project description of FTIP ID IMP190201 project (SR-186 realignments and construction of new bridge over the All-American Canal). This project is currently funded for PA&ED phase only.
- Page 163 - (1) Scheduled CCA date of RTP ID project 612003 (Route 98 widening from Ollie Avenue to Dogwood Road) is 8/30/2024. (2) Project cost and year of completion of RTP ID project 6120009 (Improve I-8/SR-186 Interchange) To Be Determined (reassessed).

District 11 Office of Multi-Modal System Planning

Comment on Connect SoCal 2024

1. In Chapter 2, on page 67, it is stated that the I-8 Imperial Avenue Interchange in the City of El Centro was reconstructed as a diamond-type overcrossing. However, this interchange was reconstructed as a standard 4 lane overcrossing, not a diverging diamond interchange.

Comments on Project List Technical Report

It is recommended to make the following changes to the Project List Technical Report:

- On page 4 (FTIP ID 515) and page 163 (RTP ID 6120002), it should be noted that the reconstruction of the I-8 interchange at Imperial Ave has already been completed. The design did not incorporate a diverging diamond layout. Including completed projects in the plan may not be necessary.
- On page 163 (RTP ID 6120003), it should be noted that road widening on SR 98 from Rockwood Ave to Ollie Ave in the City of Calexico has already been completed. Including completed projects in the plan may not be necessary.
- On pages 163, 432, and 433, for all widening projects on Caltrans highways, we suggest adding language about operational improvements as the recommended short-term solution with the potential to widen in the future. Please refer to CAPTI, pages 18 and 19, for additional guidance on this topic.

General Comments

1. Recommend including more discussion on how the plan complies with Title VI in the body of the report; or including a sentence stating that more information on this topic can be found in the Equity Analysis Technical Report.
2. Recommend including more discussion on the importance of Ports of Entry (POEs) along Mexico border in the body of the report; or including a sentence stating that more information on this topic can be found in the Goods Movement Technical Report.
3. Recommend including more discussion on how the plan supports the vision of state planning documents such as CAPTI and CTP 2050 and local plans in body of report; or including a sentence stating that more information on this topic can be found in the Mobility Technical Report.

Caltrans District 12

District 12, Various Offices

Comments on Connect SoCal 2024

1. Page 31, “Active Transportation” - Recommend discussing the rising popularity of e-bikes.
2. Page 34, “Clean Energy Transition” - Consider including a small note about the challenges facing the uptake of new technologies (e.g. implementation of ZEV infrastructure).
3. Page 40, Map 2.2 “Existing Transit Network (2019/2022)” - Why does the map depict the transit network from two different years? This should either be explained in the narrative, or the title should be revised.
4. Pages 65-67, “Plan Implementation” - Please consider listing one of Caltrans District 12’s (Orange County) 2020 FTIP projects such as the I-405 Improvement Project (2020 FTIP ID: ORA030605).
5. Page 88, “Complete Streets” - Provide a more robust definition of Complete Streets – i.e., include the transportation modes that Complete Streets are designed for, such as walking, bicycling, transit, driving, etc. Refer to page 93 as an example.
6. Page 88, “Transit and Multimodal Integration” - Consider mentioning that easy/seamless transitions/connections between modes of transportation (e.g., first/last mile connections) encourage the use of transit and other alternative modes of transportation, such as walking and bicycling.
7. Pages 88-89, “Mobility Policies and Strategies” - In addition to the smart/dynamic parking strategy listed in ITS, include other parking-related strategies; for example, parking benefit districts, employer cash-out programs, and reducing or eliminating off-street parking requirements. These can be included under TDM.
8. Page 89, “Mobility Policies and Strategies” - Include examples of technology designed to enhance the efficiency and convenience of transit, especially surface transit (e.g., transit signal priority, all-door boarding).
9. Page 94, Map 3.1 “Planned Transit Network” - It is difficult to distinguish “Rapid Bus and Bus Rapid Transit” from regular “Bus Routes” on this map.
10. Page 94, Map 3.1 “Planned Transit Network” - Put the projected year in the title.
11. Page 114, “Complete Streets” or “Transit and Multimodal Integration” - Consider directly linking Complete Streets/Active Transportation and Transit, as first/last mile connections between modes can encourage people to utilize active transportation and/or transit.
12. Page 115, “Safety” - Consider specifically noting safety for vulnerable road users (e.g., active transportation users). Vulnerable road users face disproportionate safety impacts, and a specific note about vulnerable road users’ safety calls attention to the importance of providing safe and comfortable infrastructure for these users. This would also connect to and support the “Transportation Safety” Key Mobility Challenge on page 43 and the “Safety” Implementation Strategy on page 89.

General Comments on Connect SoCal 2024

1. There is an effort to turn State conventional highways into people-centered “Main Streets” that incorporate complete streets and improve intermodal access. SCAG is working with Caltrans to create a plan incorporating these ‘Main Street’ elements into State Routes within the SCAG region. Consider including “Main Street” efforts in Regional Strategic Investments, Active Transportation, or other applicable sections.

2. Consider establishing a more comprehensive and robust “first/last” mile strategy and network for the region to facilitate transit use.
3. Please include additional references or data summarizing input received from cyclists and other active transportation participants in applicable sections.

Comment on Congestion Management Technical Report

- Page 51, “Car Pooling and Vanpooling” - Consider mentioning the network of Park and Ride lots in the region and opportunities or strategies to convert those to Mobility Hubs.

Comment on Mobility Technical Report

- Page 203, Map 4-2 “SCAG Regional Express Lanes Network” - The limit of the “Planned_DualLane_Segments_2” line on I-5 in Orange County should end at SR 91. The thick blue line seems to be going beyond SR 91. Blue points representing “Proposed HOV-HOT” should be added to interchanges at I-5/SR 91, I-5/SR 57, and I-5/SR 55.

Comments on Project List Technical Report

Financially Constrained Projects:

1. Page 254, Project RTP ID: “2M0717-ORA131105” - Amend Completion Year to 2035, Project Cost to \$241 million, and Lead Agency to Orange County Transportation Authority (OCTA).
2. Page 254, Project RTP ID: “2M0735A” - Amend Project Cost to \$85 million.
3. Page 256, Project RTP ID: “2M0719” - Amend Completion Year to 2027.
4. Page 257, Project RTP ID: “2M0732” - Amend Lead Agency to Caltrans and Project Cost to \$456.4 million. Note: Caltrans District 12 has begun coordination with SCAG to amend the Lead Agency. SCAG has since notified OCTA of their intent to update the Lead Agency to Caltrans for this project on the Financially Constrained Project List.

ATTACHMENT B: COMMENTS

Program Environmental Impact Report (PEIR)

Caltrans District 11

District 11, Various Offices

Comments on Program Environmental Impact Report

- | | |
|--|---------|
| 1. Page 3.12-2 of the document under Section: Mineral Resources of Regional Significance – this section references the “...exploration for lithium along the Salton Sea...” perhaps this section can include updated information of the lithium deposits that have been confirmed in Imperial County by the Salton Sea. There is a lot more information on lithium at the County’s website:
https://lithiumvalley.imperialcounty.org/ | STA 2-2 |
| 2. On Map ES-2 change map legend from “Imperial Valley Association of Governments (IVAG)” to “Imperial County Transportation Commission.” | STA 2-3 |
| 3. Section 3.18 Tribal Cultural Resources, page 3.18-2, 2nd paragraph. Under "Existing Conditions", the Imperial/Riverside County Indian Reservations was mistaken listed the Torres-Martinez Indian Reservation as "Martinez" and "Torres" for Imperial and Riverside respectively. The Torres Martinez Indian Reservation straddles both counties, the correct name should be used here. Also listed was the Colorado River Reservation under Imperial County and that is incorrect, there are only two tribes in Imperial County (Torres Martinez and Fort Yuma Indian Reservations). Colorado River Reservation is in Riverside/San Bernardino Counties. | STA 2-4 |

Caltrans District 12

District 12, Various Offices

Comments on Program Environmental Impact Report

1. Page 2-17, "Complete Streets" - Please include an explicit reference to vulnerable road users as the target beneficiaries of Complete Streets. This may include, low-income, communities of color, the disabled, the elderly, homeless, bicyclists, and pedestrians. STA 2-5
2. Page 2-45, Map 2-11 "Planned Regional Express Lane Network" - The limit of the "Planned Dual-Lane Segments" on I-5 in Orange County should end at SR 91. The thick blue line seems to be going beyond SR 91. Green points representing "Planned HOV-to-Express Lane Direct Connector Conversion" should be added to interchanges at I-5/SR 91, I-5/SR 57, and I-5/SR 55. STA 2-6
3. Page 3.17-12, "Bicycle and Pedestrian Facilities" - Expand on the bikeway classifications. For example, instead of "Class III bikeways are signed routes", note that these facilities are shared with motor vehicles and may include elements such as shared lane markings or "sharrows". STA 2-7
4. Page 3.17-27, "Sustainable Communities and Climate Protection Act (Senate Bill 375)" – Provide further discussion on efforts to "Streamline access to public transportation through programs such as the California Integrated Transportation Program" when discussing Senate Bill 375's 2022 Scoping Plan. STA 2-8

District 12, Various Offices

General Comments on Program Environmental Impact Report

1. Environmental analysis addresses all 20 environmental issue areas and meets the State's and Caltrans requirements. Please provide additional figures when possible to clarify the text. STA 2-9
2. Mitigation is an important component of the PEIR. Existing mitigation sites should be included, if possible, in the PEIR with publicly available maps. STA 2-10
3. Please consider further leveraging strategic investments to maintain and modernize a multimodal freight transportation system with innovative approaches. STA 2-11

Letter STA 3

From: Long, Kevin@CHP <Kevin.Long@chp.ca.gov>
Sent: Friday, January 12, 2024 2:24 PM
To: 2024 PEIR
Cc: CHP-EIR; state.clearinghouse@opr.ca.gov
Subject: FW: Environmental Document Review – SCH # 2022100337 Due to Lead Agency by 1/12/2024
Attachments: Border SCH 2022100337.pdf

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Report Suspicious

Good afternoon,

Thank you for the opportunity to respond to the EIR listed above. Border Division had one Area (San Gorgonio) determine there would be an impact. Their response is as follows:

Based on the population projections included in the plan, the CHP San Gorgonio Pass believes the current infrastructure is insufficient on the I-10 eastbound and westbound off-ramps to SR-79 (Beaumont Avenue). In present day, traffic already backs up into the general lanes of the freeway, causing a traffic hazard for other motorists. With the expected increase in population, the problem can potential cause crashes that result in injuries or fatalities.

STA
3-1

Another area of concern in SR-79 between Gilman Springs Road and Ramona Expressway. The two lanes of traffic in both directions is insufficient for the current population. Recurrent traffic already creates delays for the public and emergency services. With the expected increase in population, the problem can potential cause crashes that result in injuries or fatalities, or delay the response of emergency services and result in the loss of life.

STA
3-2

Sergeant Kevin Long

California Highway Patrol
Border Division Administrative Assistant
9330 Farnham Street, San Diego, CA 92123
(858) 944-6300



From: CHP-EIR <EIR@chp.ca.gov>
Sent: Thursday, December 28, 2023 10:14 AM
To: CHP-80AADesk <80AADesk@chp.ca.gov>; CHP-50AADesk <50AADesk@chp.ca.gov>; Walton, Vic@CHP <VWalton@chp.ca.gov>; Purvis, Bobby@CHP <BPurvis@chp.ca.gov>; Long, Kevin@CHP <Kevin.Long@chp.ca.gov>; CHP-701_AA_Desk <701_AA_Desk@chp.ca.gov>
Cc: White, Shannon@CHP <Shannon.White@chp.ca.gov>
Subject: Environmental Document Review – SCH # 2022100337 Due to Lead Agency by 1/12/2024

Good morning,

Special Projects Section (SPS) recently received the referenced Notice of Environmental Impact document from the State Clearinghouse (SCH) outlined in the following Web site:

[2024-2050 Regional Transportation Plan and Sustainable Communities Strategy \(RTP/SCS\) Program Environmental Impact Report \(ca.gov\)](#)

Due to the project's geographical proximity, please use the attached checklist to assess its potential impact to local operations and public safety. **If impact is determined**, responses should be e-mailed directly to the Lead Agency with cc to SCH and myself. **If there is no impact**, please do not include SCH or the Lead Agency in your response.

For more information on the EIR review process, please check out: [Power Point Commanders EIR Training.pptx \(sharepoint.com\)](#).

Please feel free to e-mail me if you have any questions.

Thank you,

Shannon White, AGPA
Special Projects Section, Transportation Planning Unit
Office: (916) 843-3370
Direct: (916) 843-3382

STA
3-3

Memorandum

Date: December 27, 2023

To: Border Division

From: **DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**
Special Projects Section

File No.: 063.A10212.A17352.NoC.Doc

Subject: ENVIRONMENTAL DOCUMENT REVIEW AND RESPONSE
SCH# 2022100337

Special Projects Section (SPS) recently received the referenced Notice of Completion environmental impact document from the State Clearinghouse (SCH).

Please use the attached checklist to assess its potential impact to local Area operations and public safety. If it is determined that departmental input is advisable, your written comments referencing the above SCH number must be emailed to EIR@chp.ca.gov. Your written comments must be received no later than **January 12, 2024**.

STA 3-4

If a project of interest impacts more than one Division, the SPS is responsible for coordinating any necessary response from the Divisions to the appropriate agency. For reference, additional information can be found in General Order 41.2, Environmental Impact Documents.

For questions or concerns, please contact the Transportation Planning Unit at (916) 843-3370.



L. NARVAEZ, SSM III
Commander

Attachments: Checklist
Project File

cc: Southern Division
Coastal Division
Inland Division



Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2022100337

Project Title: Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy) Program Environmental Impact Report
Lead Agency: Southern California Association of Governments
Mailing Address: 900 Wilshire Blvd., Ste. 1700
City: Los Angeles Zip: 90017 County: Imperial, Los Angeles, Orange, Riverside, San Bernardino, Ventura
Contact Person: Karen Calderon, Sr. Reg. Planner
Phone: (213) 236-1983

Project Location: County: Six County Area (see PEIR) City/Nearest Community: NA
Cross Streets: NA Zip Code: NA
Longitude/Latitude (degrees, minutes and seconds): NA ° NA ' NA " N / NA ° NA ' NA " W Total Acres: NA
Assessor's Parcel No.: NA Section: NA Twp.: NA Range: NA Base: NA
Within 2 Miles: State Hwy #: NA Waterways: NA
Airports: NA Railways: NA Schools: NA

Document Type:
CEQA: [] NOP [] Early Cons [] Neg Dec [] Mit Neg Dec [x] Draft EIR [] Supplement/Subsequent EIR (Prior SCH No.) [] Other:
NEPA: [] NOI [] EA [] Draft EIS [] FONSI
Other: [] Joint Document [] Final Document [] Other:

Local Action Type:
[] General Plan Update [] Specific Plan [] Rezone [] Annexation
[] General Plan Amendment [] Master Plan [] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [] Site Plan [] Land Division (Subdivision, etc.) [x] Other: N/A

Development Type:
[] Residential: Units _____ Acres _____
[] Office: Sq.ft. _____ Acres _____ Employees _____
[] Commercial: Sq.ft. _____ Acres _____ Employees _____
[] Industrial: Sq.ft. _____ Acres _____ Employees _____
[] Educational: _____
[] Recreational: _____
[] Water Facilities: Type _____ MGD _____
[] Transportation: Type _____
[] Mining: Mineral _____
[] Power: Type _____ MW _____
[] Waste Treatment: Type _____ MGD _____
[] Hazardous Waste: Type _____
[x] Other: Connect SoCal 2024 (2024 RTP/SCS)

Project Issues Discussed in Document:
[x] Aesthetic/Visual [x] Fiscal [x] Recreation/Parks [x] Vegetation
[x] Agricultural Land [x] Flood Plain/Flooding [x] Schools/Universities [x] Water Quality
[x] Air Quality [x] Forest Land/Fire Hazard [x] Septic Systems [x] Water Supply/Groundwater
[x] Archeological/Historical [x] Geologic/Seismic [x] Sewer Capacity [x] Wetland/Riparian
[x] Biological Resources [x] Minerals [x] Soil Erosion/Compaction/Grading [x] Growth Inducement
[x] Coastal Zone [x] Noise [x] Solid Waste [x] Land Use
[x] Drainage/Absorption [x] Population/Housing Balance [x] Toxic/Hazardous [x] Cumulative Effects
[x] Economic/Jobs [x] Public Services/Facilities [x] Traffic/Circulation [] Other:

Present Land Use/Zoning/General Plan Designation:
NA

Project Description: (please use a separate page if necessary)
Connect SoCal 2024 is a long-range visioning plan that balances future mobility and housing needs with economic and environmental goals. Connect SoCal 2024 represents the vision for Southern California's future through 2050, including planning policies, strategies, and projects. It details how the region will address its transportation and land use challenges and leverage opportunities to support attainment of applicable federal air quality standards and achieve state's greenhouse gas (GHG) emissions reduction targets. Connect SoCal 2024 builds from the policy directions established in the last adopted Connect SoCal 2020, as amended, as well as more recent policy directions from SCAG's Regional Council to reflect emerging issues including racial equity, resilience and conservation, climate change, next generation infrastructure, and the economy. Please see Chapter 2.0, Project Description, of the Draft 2024 PEIR for more information.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

STA 3-4 (cont.)

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".
If you have already sent your document to the agency please denote that with an "S".

- | | |
|---|---|
| <input checked="" type="checkbox"/> Air Resources Board | <input checked="" type="checkbox"/> Office of Historic Preservation |
| <input type="checkbox"/> Boating & Waterways, Department of | <input checked="" type="checkbox"/> Office of Public School Construction |
| <input checked="" type="checkbox"/> California Emergency Management Agency | <input checked="" type="checkbox"/> Parks & Recreation, Department of |
| <input checked="" type="checkbox"/> California Highway Patrol | <input type="checkbox"/> Pesticide Regulation, Department of |
| <input checked="" type="checkbox"/> Caltrans District # <u>7,8,11,12</u> | <input checked="" type="checkbox"/> Public Utilities Commission |
| <input checked="" type="checkbox"/> Caltrans Division of Aeronautics | <input checked="" type="checkbox"/> Regional WQCB # <u>4, 6, 7, 8</u> |
| <input checked="" type="checkbox"/> Caltrans Planning | <input checked="" type="checkbox"/> Resources Agency |
| <input type="checkbox"/> Central Valley Flood Protection Board | <input checked="" type="checkbox"/> Resources Recycling and Recovery, Department of |
| <input checked="" type="checkbox"/> Coachella Valley Mtns. Conservancy | <input type="checkbox"/> S.F. Bay Conservation & Development Comm. |
| <input checked="" type="checkbox"/> Coastal Commission | <input checked="" type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy |
| <input checked="" type="checkbox"/> Colorado River Board | <input type="checkbox"/> San Joaquin River Conservancy |
| <input checked="" type="checkbox"/> Conservation, Department of | <input checked="" type="checkbox"/> Santa Monica Mtns. Conservancy |
| <input checked="" type="checkbox"/> Corrections, Department of | <input checked="" type="checkbox"/> State Lands Commission |
| <input type="checkbox"/> Delta Protection Commission | <input type="checkbox"/> SWRCB: Clean Water Grants |
| <input checked="" type="checkbox"/> Education, Department of | <input checked="" type="checkbox"/> SWRCB: Water Quality |
| <input checked="" type="checkbox"/> Energy Commission | <input checked="" type="checkbox"/> SWRCB: Water Rights |
| <input checked="" type="checkbox"/> Fish & Game Region # <u>5, 6</u> | <input type="checkbox"/> Tahoe Regional Planning Agency |
| <input checked="" type="checkbox"/> Food & Agriculture, Department of | <input checked="" type="checkbox"/> Toxic Substances Control, Department of |
| <input checked="" type="checkbox"/> Forestry and Fire Protection, Department of | <input checked="" type="checkbox"/> Water Resources, Department of |
| <input checked="" type="checkbox"/> General Services, Department of | |
| <input checked="" type="checkbox"/> Health Services, Department of | <input checked="" type="checkbox"/> Other: <u>Fish & Game Region: South Coast, Inland Desert Region</u> |
| <input checked="" type="checkbox"/> Housing & Community Development | <input type="checkbox"/> Other: _____ |
| <input checked="" type="checkbox"/> Native American Heritage Commission | |

STA 3-4
(cont.)

Local Public Review Period (to be filled in by lead agency)

Starting Date November 9, 2023 Ending Date January 12, 2024

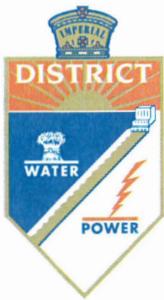
Lead Agency (Complete if applicable):

Consulting Firm: _____ Applicant: _____
 Address: _____ Address: _____
 City/State/Zip: _____ City/State/Zip: _____
 Contact: _____ Phone: _____
 Phone: _____

Signature of Lead Agency Representative: Karen Calderon Date: 11/09/23

Digitally signed by Karen Calderon
 DN: cn=Karen Calderon, o=State Clearinghouse, email=kcald@clearing.ca.gov, c=US
 Date: 2023.11.09 11:28:41 -0800

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.



IID

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Letter REG 1

www.iid.com

Since 1911

January 11, 2024

Ms. Karen Calderon
Southern California Association of Governments
900 Wilshire Blvd, Suite 1700
Los Angeles, California 90017

SUBJECT: The Connect Socal 2024 Draft Program Environmental Impact Report

Dear Mr. Calderon:

Pursuant to the Notice of Availability of a Draft Program Environmental Impact Report for the Regional Transportation Plan/Sustainable Communities Strategy (Connect Socal), which the Southern California Association of Governments updates every four years following federal and state planning requirements to address how the Southern California region will address its transportation and land use challenges and leverage opportunities in order to support attainment of applicable federal ambient air quality standards and achieve state's greenhouse gas emissions reduction targets future through 2050, the Imperial Irrigation District has reviewed the project information has the following comments:

REG
1-1

1. It is understood that SCAG does not have authority to implement individual transportation projects in the RTP, nor does the SCS supersede the land use authority of cities and counties in the region and that specific projects and policies will be implemented by local jurisdictions, state agencies, and other agencies, nevertheless for the sake of clarity it is important to note that IID operates and maintains an irrigation and drainage system consisting of more than 3,000 miles of canals and drains throughout Imperial County. Consequently in the process of the development and implementation of the RTP/SCS it is imperative that the integrity of IID's irrigation and drainage system be maintained. IID has a planning review process to be followed for review and analysis of plans and alternatives for transportation infrastructure, including expansion of existing roads, highways, rail and airports, and impacts of these plans on the IID water system.

REG
1-2

2. Furthermore, IID is the sixth largest electrical utility in California and serves more than 150,000 customers and for purposes of providing electrical service to a project, IID will not begin any engineering studies to provide such service until the project proponent submits a customer project application and detailed loading information, panel sizes, project schedule and estimated in-service date. The project proponent shall bear all costs associated with providing electrical service to the project, including but not limited to the construction of the new substation facilities, transmission line extensions, distribution getaways, distribution feeder breakers, feeder backbones and distribution overhead and/or underground line extensions, as well as the cost of any other related upgrades and applicable permits, zoning changes, landscaping (if required by the City) and rights-of-way and easements.

REG
1-3

3. A detailed feasibility/impact study will be developed once a customer project application and approved plans and loading calculations are received. This detailed information will

REG
1-4

<p>allow IID to perform an accurate assessment and provide a full report of any potential impacts and mitigation measures. The conditions of service could change as a result of the additional studies. The cost of any additional technical assessment/study shall be borne by the project proponent.</p>	REG 1-4 (cont.)
<p>4. The project proponent will be required to provide rights of ways and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project as well as the necessary access to allow for continued operation and maintenance of any IID facilities located on adjoining properties.</p>	REG 1-5
<p>5. Public utility easements over all private public roads and additional ten (10) feet in width on both side of the private and public roads shall be dedicated to IID for the construction, operation, and maintenance of its electrical infrastructure.</p>	REG 1-6
<p>6. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances).</p>	REG 1-7
<p>7. Any new, relocated, modified or reconstructed IID facilities required for and by a project (which can include but is not limited to electrical utility substations, electrical transmission and/or distribution lines, ancillary facilities associated with the conveyance of energy service; the acquisition and dedication of real property, rights of way and/or easements for the siting and construction of electrical utility substations, electrical transmission and/or distribution lines and ancillary facilities associated with the conveyance of energy service, etc.) need to be included as part of the project's California Environmental Quality Act and/or National Environmental Policy Act documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. Any mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.</p>	REG 1-8
<p>8. Dividing a project into two or more pieces and evaluating each piece in a separate environmental document (Piecemealing or Segmenting), rather than evaluating the whole of the project in one environmental document, is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. The State CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either</p>	REG 1-9

directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. CEQA case law has established general principles on project segmentation for different project types. For a project requiring construction of offsite infrastructure, the offsite infrastructure must be included in the project description. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App. 4th 713.

REG
1-9
(cont.)

9. Project proponents should be advised that in the event of an outage, or equipment failure, it is vital that IID personnel have immediate and safe access to its equipment to make the needed repairs. For public safety, and that of the electrical workers, it is important to adhere to standards that limit landscaping around electrical facilities.

REG
1-10

Should you have any questions, please do not hesitate to contact me at (760) 482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

REG
1-11

Respectfully,


Donald Vargas
Compliance Administrator II

San Joaquin Hills
Transportation
Corridor Agency
Vice Chair: Janine Heft
Laguna Hills



Foothill/Eastern
Transportation
Corridor Agency
Chair: John Taylor
San Juan Capistrano

January 12, 2024

Via Email: ConnectSoCalPEIR@scag.ca.gov

Mr. Kome Ajise
Executive Director
Southern California Association of Governments
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

RE: Comments on the Draft Connect SoCal Plan 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy and associated Draft Programmatic Environmental Impact Report

Dear Mr. Ajise:

The San Joaquin Hills Transportation Agency and the Foothill/Eastern Transportation Corridor Agency (“TCA”) appreciates the opportunity to review and provide comments on the Draft Connect SoCal Plan 2024-2050 Regional Transportation Plan (“RTP”)/Sustainable Communities Strategy (“SCS”) and associated Draft Programmatic Environmental Impact Report (“PEIR”). TCA commends the Southern California Association of Governments (SCAG) staff and consultants for the tremendous amount of work and effort in putting these documents together. TCA also recognizes and supports the timely adoption of the RTP/SCS to enable the Southern California region to proceed with the planning and implementation of regionally significant transportation projects. Further, TCA recognizes that the SCS is particularly important for the region to meet its state-mandated greenhouse gas (GHG) emissions reduction goals and federal Clean Air Act requirements.

REG 2-1

TCA generally supports the comments submitted by the Orange County Council of Governments (OCCOG) on behalf of Orange County jurisdictions, the Center for Demographic Research, the Orange County Transportation Authority, and other Orange County jurisdictions.

REG 2-2

In addition, please find below TCA’s specific comments applicable to both the draft RTP/SCS and PEIR.

REG 2-3

Page 92, Regional Express Lanes Network: Concept of Operations and Buildout

The Draft Connect SoCal Plan should include toll roads in the description of projects included in this category. TCA-operated Toll roads are complimentary to express lane and HOT lane facilities via FasTrak technology that allows interoperability and convenience for drivers.

Recommended Clarification

Revise the text in the first sentence under Regional Express Lanes Network on page 92 to read, “The regional express lane network, including toll roads, and Express/HOT lanes, integrates congestion pricing to...

- The text under this section should discuss that all priced facilities in the SCAG region ensure inter-operability by using a common technology, FasTrak, to collect user fees.

Project List Technical Report

Page 100, Table 1: FTIP Projects, FTIP ID ORA111207

County	System	FTIP ID	Route	LEAD AGENCY	Description	Project Cost (\$1,000's)
ORANGE	STATE HIGHWAY	ORA111207	241	VARIOUS AGENCIES	241/91 EXPRESS LANES (HOT) CONNECTOR: NB SR-241 TO EB SR-91, WB SR-91 TO SB SR-241.	\$423,000

Recommended Clarification

- In Table 1, we request that the Project Cost be updated to \$423M, consistent with FTIP Amendment number 23-11.

Page 257, Table 2: Financially Constrained Projects, RTP ID 2T01135

COUNTY	SYSTEM	RTP ID	ROUTE	ROUTE NAME	FROM	TO	DESCRIPTION	COMPLETION YEAR	PROJECT COST
ORANGE	STATE HIGHWAY	2T01135	241		SR-91		241/91 EXPRESS LANES (HOT) CONNECTOR: NB SR-241 TO EB SR-91, WB SR-91 TO SB SR-241	2035	\$423,000

Recommended Clarification

Project 2T01135, please change Lead Agency to “Various Agencies” consistent with Table 1 and update the project cost to \$423M consistent with the FTIP Amendment number 23-11.



Transportation Corridor Agencies™

TCA thanks you in anticipation of your written responses to these comments. We look forward to the amendments in the final 2024-2050 RTP/SCS and associated PEIR to incorporate the recommended changes. Should you have any questions or require any clarification regarding these comments, please feel free to contact me at 949.754.3454 or via email at sblanco@thetollroads.com.

REG 2-4

Sincerely,

Stephanie
Blanco

Digitally signed by
Stephanie Blanco
Date: 2024.01.12 17:02:50
-08'00'

Stephanie Blanco
Chief Capital Programs Officer

cc: Doug Feremenga, Transportation Corridor Agencies, Environmental Manager



Orange County Council of Governments

Letter SUB 1

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

info@occog.com

January 11, 2024

Mr. Kome Ajise
Executive Director
Southern California Association of Governments
900 Wilshire Blvd., Suite 1700
Los Angeles, CA 90017

ajise@scag.ca.gov

dominguezs@scag.ca.gov

ConnectSoCalPEIR@scag.ca.gov

update@scag.ca.gov

Uploaded via: <https://scag.ca.gov/connect-socal-2024-comment-submission-form>

Subject: Orange County Council of Governments Comments for Connect SoCal 2024 RTP/SCS and PEIR

Dear Mr. Ajise:

On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal 2024) and the associated Program Environmental Impact Report (PEIR). The draft 2024 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction targets and other air conformity standards.

As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2024 RTP/SCS, PEIR and related documents. The ad hoc committee includes representation from the OCCOG; the cities of Irvine, Laguna Beach, Mission Viejo, and Santa Ana; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; the Building Industry Association; and the Center for Demographic Research (CDR) at California State University Fullerton. This committee met six times during the public comment period, and has collectively spent well over three hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.

SUB 1-1



The OCCOG TAC review and analysis was discussed by the full OCCOG Technical Advisory Committee at both the December and January meetings, and at a special meeting of the OCCOG Board of Directors that took place on January 11, 2024 and serves as the basis for OCCOG’s comments.

SUB 1-1
(cont.)

The following general comments and recommendations are offered by OCCOG on the draft 2024 Connect SoCal Plan and PEIR and all associated technical reports. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 2. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2024 Connect SoCal Plan, PEIR, and associated documents.

1. Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research

The OCCOG concurs with the comments identified by OCTA in its January 2024 letter. OCTA has identified policy and technical issues related to the draft 2024 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.

SUB 1-2

2. Connect SoCal consistency determinations

The Demographics and Growth Forecast Technical Report is currently the only document that contains language on Traffic Analysis Zone (TAZ) consistency—what has been referred to as the “TAZ disclaimer”. OCCOG is proposing updated language to clarify the limitations of the use of the growth forecast data and forecasted development pattern. OCCOG requests the updated language replace the current applicable language in the Demographics and Growth Forecast Technical Report—the only location it is currently used—and further requests the language be added to the main RTP/SCS document at the end of page 97, the Land Use & Communities Technical Report, and as a response to comments in the draft PEIR. The full text of the requested Consistency Language is included in Attachment 1 of this letter.

SUB 1-3

In addition, any maps or figures that contain or depict the growth forecast data, including TAZ-level maps or development patterns, need to have the following language embedded in the map or figure.



Insert data usage paragraph:

“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”

SUB 1-3
(cont.)

Recommendations: 1) Replace the Consistency Language in the Demographics and Growth Forecast Technical Report on page 45 with the language provided in Attachment 1. 2) Add the revised consistency language into the main Connect SoCal document starting on page 97. 3) Add the Consistency Language to the PEIR response to comments. 4) Add the revised consistency language into the Land Use and Communities Technical Report as Section 7.5. 5) Add the data usage paragraph to all growth forecast maps and figures reporting or depicting growth forecast, development patterns, or TAZ-level data (see attached matrix).

3. Priority Development Areas (PDAs)

OCCOG recognizes SCAG’s movement away from High Quality Transit Areas (HQTAs) that were focus areas in the 2020 RTP/SCS and the 6th RHNA cycle and now see the focus on Priority Development Areas (PDAs) in the 2024 RTP/SCS. OCCOG also recognizes the alignment of SCAG’s Regional Housing Needs Assessment (RHNA) and RTP/SCS documents are required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m), however, OCCOG recommends extreme caution in using and requests close consultation with local jurisdictions for any use of Priority Development Areas, such as Neighborhood Mobility Areas and Transportation Priority Areas, identified in the RTP/SCS for future purposes related to the RHNA methodology. Further OCCOG strongly advises that local jurisdictions shall not be held to these PDAs, as development patterns within a city and/or county are subject to change and such locations identified in the RTP/SCS may not be viable for future development. For any methodology to develop future RHNA allocations, jurisdictions and the Technical Working Group should be consulted.

SUB 1-4



Recommendation: Consult with jurisdictions and the Technical Working Group on any methodology to develop future RHNA allocations or use of Priority Development Areas (PDAs) in other SCAG efforts.

SUB 1-4
(cont.)

4. Process Concerns

Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform and clarify the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR. Despite OCCOG’s ongoing and repeated efforts, there continues to be a disconnect between SCAG’s constitution of and reliance on the Technical Working Group (TWG), comprised of planning staff from SCAG member agencies and experts across the region, and how members of the group would like to be consulted and provide advisement. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies. One request in this vein would be to engage the TWG on updating SCAG’s style guide to facilitate consistency across documents and publications and promote clarity and ease of comprehension across all levels of engagement.

Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders and continued these for the 2024 process. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan. However, the proliferation of new meetings requires jurisdictions to have additional bandwidth to monitor and participate, and there has been little to no interaction from the issue-specific groups with the long-standing TWG. Coupled together this does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and continues to result in silos of information.

SUB 1-5

Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2028 cycle to allow for a more robust review process prior to the holidays—or even completion of the whole process before the holidays—that would ensure that comments being provided as part of the public comment period have the opportunity to be fully considered by SCAG staff and the policy committees, and stakeholders and jurisdictions have the opportunity to ensure that comments have been addressed, prior to asking the Regional Council to adopt the final plan. This has been a long-standing concern since the 2012 RTP/SCS iteration where each Plan has been released near the holidays and the public comment period has covered holidays and closures that often make it difficult to find ample time for thorough technical review of the hundreds of pages of documents before comments are provided to governing boards for consideration to submit as official public comment. In this cycle, OCCOG has been



forced to convene a special Board meeting simply to be able to offer our comments within the public comment window. Below are the dates from previous iterations that show the compressed timeline for both reviewers and SCAG’s response to comments—none of which allowed time for significant changes or updates to the documents after the public comment period.

	RTP/SCS ITERATION			
	2024	2020	2016	2012
Regional Council approve release of DRAFT Connect SoCal document & PEIR to follow.	11/2/2023	11/7/2019	12/3/2015	12/1/2011
SCAG releases draft PEIR	11/9/2023	12/9/2019	12/4/2015	12/30/2011
Comment period closes	1/12/2024	1/24/2020	2/1/2016	2/14/2012
Release of final RTP/SCS & response to comments RTP/SCS	TBD	3/27/2020	3/14/2016	3/20/2012
Release of FINAL PEIR & response to comments	TBD	3/27/2020	3/18/2016	3/19/2012
RTP/SCS & PEIR approval	ETA 4/4/2024	COVID-19; 5/7/2020 & 9/3/2020	4/7/2016	4/4/2012
Length of RTP comment period	71	78	60	75
Length of PEIR comment period	64	46	59	46

SUB 1-5
(cont.)

Allocate Ample Time for Robust Regional Council Discussion The RTP/SCS and PEIR are both topics that require considered debate and are likely to generate discussion among policy makers. In past iterations, discussion was cut off to accommodate some Regional Council members’ travel plans. We strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.

Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees. Have the TWG discuss and provide technical report best practice guidance regarding the style guide used for SCAG’s documents and publications. Have liaisons from each subject-matter working group participate in the TWG and ensure TWG members are included in the distribution of materials from issue-specific working groups so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2028 cycle and release drafts six months earlier to ensure that there is adequate time after the initial draft is released to SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted two hours for a meeting.



5. Growth Forecast

OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2024 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.

OCCOG opposes any alternative in the PEIR that does not utilize local input provided through the local input/Local Data Exchange (LDX) process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction submitted by jurisdictions should not be utilized as the preferred alternative.

SUB 1-6

We also want to restate our appreciation for the LDX process during this iteration whereby SCAG folded in the growth visioning and policies into the initial draft growth forecast that was provided to local jurisdictions for review during the LDX process. OCCOG has staunchly advocated for this approach since the 2012 RTP/SCS development process. The inclusion of the local jurisdiction input submitted on housing and employment directly into the RTP/SCS—and unchanged— demonstrates the successful collaborative visioning along with accurately reflecting entitlements and local policies and plans. We urge SCAG to continue this same process in future iterations.

6. Remain Neutral on Technology

Throughout the documents, there are specific examples of technology identified. It is not SCAG’s purview to pick winners and losers in technology; the marketplace will determine dominant technologies. Therefore, it should be noted that these are only examples and that future technologies should not be ignored or excluded from meeting the goals of the RTP/SCS. This will allow the document, including mitigation measures, to be more inclusive of and responsive to changing technological advances.

SUB 1-7

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG’s desire to facilitate and support innovation, but avoid naming specific technologies or providers (example “TNCs” not “Uber and Lyft” or “zero emissions” instead of “electrification”).

7. Maintain Unbiased, Objective Tone

Language throughout the draft Connect SoCal Plan and PEIR and the associated technical reports and appendices has a tendency to be leading and dramatic in its

SUB 1-8



emphasis of certain key issues, such as housing, equity, and land use policy. While these issues are important, using opinion-based and emotionally charged language is inappropriate in this context.

Recommendation: SCAG should remove, wherever applicable, opinion and descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.

SUB 1-8
(cont.)

8. “Can and Should”

As indicated in the PEIR, state law provides that it is appropriate to indicate in mitigation measures that they “can and should” be implemented where the authority to implement the measures rest with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies’ regulatory measures. OCCOG recognizes SCAG’s use of the words “can and should” are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies’ land use authority, OCCOG deems any language seemingly imposing affirmative obligations contrary to SB 375 inappropriate. As such, the use of the language “can and should” for mitigation measures addressed to local agencies is overreaching. SCAG should therefore add the following qualifier subsequent to each use of “can and should”: “where applicable and feasible”.

SUB 1-9

Recommendation: Ensure consistent language in each project-level mitigation measure by adding “where applicable and feasible.” This change will clarify that the project-level mitigation measures are a menu of options.

9. Duplicative/Existing Regulations

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact, and the significance of the impact should be looked at after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply

SUB 1-10



restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If SCAG opts not to remove mitigation measures that restate existing regulation, then OCCOG requests that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken.

SUB 1-10
(cont.)

Recommendation: OCCOG proposes the use of: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations,” and acknowledges SCAG has already included similar language in some mitigation measures.

10. Provide Sources for All Graphics and Tables

When a report of such complexity as the Connect SoCal Plan is produced, it is common for tables, maps, and other graphics to be used or referred to in a manner that could divorce them from the context in which they are presented. For instance, someone may come upon a chart that explains a topic they are researching and could download the image separate and apart from the technical explanation accompanying it in the electronic version of the document. Without original source information embedded in the graphic, information can be spread without proper attribution. We understand that it may “look cleaner” to not include a source, date, and citation for data but best practices for technical reports include adding sources to all graphics. In addition, citing another SCAG report as the source instead of the original data source should be avoided.

SUB 1-11

Recommendation: Make it a SCAG style guide policy to include the original source and date of all data used in tables, charts, maps, infographics etc. included in all Connect SoCal-related documents. All related documents should also be branded with “Connect SoCal 2024” to differentiate from past and future iterations.

Conclusion

The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2024 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to

SUB 1-12



accommodate adequate review, discussion, and revision time for all of the documents. The timeline adopted in the past three cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the opportunity to provide public comment, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2024 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.

SUB 1-12
(cont.)

We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have an RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do not hesitate to contact me or Marnie Primmer, OCCOG Executive Director at (949) 698-2856 or marnie@occog.com.

SUB 1-13

Sincerely,

Wendy Bucknum
Chair
Orange County Council of Governments

Attachments:

1. Consistency language
2. Matrix of comments on Connect SoCal 2024, PEIR, and Technical Reports

Cc: OCCOG Member Agencies
OCCOG Board of Directors
OCCOG TAC
OCTA Board of Directors
Orange County City Managers



ATTACHMENT 1:

Consistency language:

“In order to assess the ability of the Connect SoCal 2024 Plan to meet federal air quality standards and achieve a state greenhouse gas reduction target, SCAG creates small-area projections data for housing, population, and employment, which are known as the Tier 2 traffic analysis zone (TAZ) socioeconomic dataset (SED). Although these data are based in part on input provided by staff from local jurisdictions during the Connect SoCal 2024 Local Data Exchange process, local jurisdictions and projects within the region shall not be held to meet any specific numbers within or aggregates of the TAZ data. Connect SoCal 2024’s TAZ-level household and employment projections are created to provide estimated snapshots in time. These projections do not reflect subsequently available information (given that local jurisdictions provided their local input to SCAG between May and December 2022); and, concerning some jurisdictions, they also do not reflect all currently entitled and pending projects. Additionally, the TAZ data do not project the full build-out and realization of localities’ general plans; and they do not conform to jurisdictions’ current respective housing elements. The local plans and approvals have continued and will continue to evolve; and market forces will continue to play a major role in determining the timing, locations, and different types of development and redevelopment that will occur. Therefore, the applicable jurisdiction(s) should be contacted for the most up-to-date data available.

The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.

SCAG’s forecasted regional development pattern (FRDP) is not solely based on the TAZ-level household and employment spatial projections. It is utilized to estimate the overall effect of the many policies, goals, and strategies of Connect SoCal—which should not be uncritically applied, individually or en masse, to any particular project or plan. The TAZ-level household and employment growth projections support the region’s ability to model conformity with federal air quality standards and its ability to achieve a state greenhouse gas reduction target; they do not, however, reflect the only set of growth assumptions that may meet these standards and that target.

Therefore, insofar as housing and other laws or grants may require comparisons of projects or plans to Connect SoCal 2024, SCAG’s projections that are illustrated in TAZ maps—along with any related documents or modeling outputs—may not be used to determine the inconsistency of any plan or project in the region with Connect SoCal 2024. Given that land use decisions are properly made with attention to local contexts and circumstances, local jurisdictions and other lead agencies shall have

SUB 1-14



the sole discretion to determine a local project's or plan's general consistency and overall alignment with Connect SoCal.

For example, local jurisdictions' plans and approvals may be found to align with Connect SoCal 2024 if they directionally support a number of its objectives, such as by encouraging a mix of housing types that includes more affordable and multi-family housing rather than solely single-family, for-sale housing; providing for more housing located proximate to employment or vice versa; or encouraging increased use of transit, ridesharing, biking, walking or micro-mobility, or hybrid and remote work to reduce commuting trips. Such alignment is an appropriate basis for a local jurisdiction to determine that a plan or project is consistent with Connect SoCal 2024. Such determinations should be evaluated based on (i) the totality of the goals, policies, and objectives of Connect SoCal 2024 and its associated Program Environmental Impact Report (PEIR), and (ii) the attributes of the local project or plan in overall relation to Connect SoCal, and not in a prescriptive manner by applying SCAG's TAZ-level data, any aggregate thereof, or any particular one or more goals, policies, or objectives of Connect SoCal 2024 and its associated PEIR.

SUB 1-14
(cont.)

This flows logically from the fact that Connect SoCal 2024 includes dozens of stated directives, policies, goals, objectives, and measurements, any number of which may not be individually applicable to any given project or plan. For example, a project that provides new housing units in conformity with a jurisdiction's approved housing element can and should be found to be in overall alignment with Connect SoCal 2024 given housing production's contribution to Connect SoCal 2024 goals and policies, especially those related to affirmatively furthering fair housing, social and economic justice, jobs-housing balance, and the like.

Household or employment growth included in the Connect SoCal 2024 TAZ-level SED and maps may assist in determining consistency with the SCS for purposes of determining a project's eligibility for CEQA streamlining under SB 375 (Cal. Govt. Code § 21155(a)). TAZ-level maps and data may not otherwise be used or applied prescriptively to determine that a project is inconsistent or not in alignment with Connect SoCal 2024 for any purpose, given that myriad other development assumptions could also be found to be consistent or, on balance, aligned with the SCS. Specifically, the TAZ-level data and maps do not supersede or otherwise affect locally approved housing elements, including those adopted in compliance with the 6th Cycle of the Regional Housing Needs Assessment (RHNA)."



Contents

Table 1. 2024 RTP/CONNECT SOCAL COMMENTS & GENERAL COMMENTS.....1

Table 2. PEIR COMMENTS.....24

Table 3. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS48

Table 4. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS.....49

Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS49

Table 6. ECONOMIC IMPACT ANALYSIS TECHNICAL REPORT COMMENTS.....57

Table 7. EQUITY ANALYSIS TECHNICAL REPORT COMMENTS.....60

Table 8. GOODS MOVEMENT TECHNICAL REPORT COMMENTS64

Table 9. HOUSING TECHNICAL REPORT COMMENTS.....64

Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS77

Table 11. MOBILITY TECHNICAL REPORT COMMENTS86

Table 12. PERFORMANCE MONITORING TECHNICAL REPORT COMMENTS.....88

Table 13. PROJECT LIST TECHNICAL REPORT COMMENTS.....90

Table 14. PUBLIC PARTICIPATION AND CONSULTATION TECHNICAL REPORT COMMENTS.....90

Table 15. TRANSPORTATION CONFORMITY ANALYSIS TECHNICAL REPORT COMMENTS.....91

Table 16. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS91

TABLE 17. TRAVEL AND TOURISM TECHNICAL REPORT COMMENTS94

Table 1. 2024 RTP/CONNECT SOCAL COMMENTS & GENERAL COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION	
1	General Comment	All documents	Include “2024” in all headers for proper citation/reference since the last plan was also called “Connect SoCal”.	SUB 1-15
2	General Comment	All documents	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data	SUB 1-16
3	General Comment	All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.	SUB 1-17
4	General Comment	All documents	For data that is not derived from Connect SoCal models, cite source.	SUB 1-18
5	General Comment	All documents	If definitions come from specific source or statute, include the reference in the narrative and the glossary.	SUB 1-19
6	General Comment	All Technical Reports	Add “Technical Report” and “2024” to all technical report page headers’ titles	



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION	
7	General Comment	All documents	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.	SUB 1-20
8	General Comment	All documents	Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, otherwise known as "Spheres of Influence" the growth must be feasible	SUB 1-21
9	General Comment	All documents	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.	SUB 1-22
10	General Comment	All maps and figures with growth forecast data, TAZ data, or forecasted development pattern	Add: language to map and/or map page "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."	SUB 1-23
11	General comment	All documents	Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years. Add notes to language and table or figures that indicate " not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming." Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.	SUB 1-24
12	Correction	All pages All documents e.g., 45, 50, 59, 60, 96	References and source citations to the American Community Survey dataset should use the word "estimates" not "sample", e.g., "Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates" or for PUMS: "Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021"	SUB 1-25
13	General Comment	All pages	"state of California" should be "State of California" "county/counties of xxx" should be "County of xxx"	SUB 1-26



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION			
14		Glossary	Add to glossary: 15-minute communities ACS AFFH ASMSA AT AVTA BTU BUILD CAL ITP CALFIRE CAV CCED CCSO communities of color CPAD	CPI CTC DOT EEC FEMA FHSZ FLMA FMMP GDP historically marginalized HQTACs HSD ICT Indigenous populations INFRA LC LMFDS	LMFP MBPS MIP NHHW NHS OCFC PACT Protected populations p.188 Priority communities p.188 PTS PUMS RFM1 RIF RRIF RTPAS SAFETEA-LU SCM1 SCORE	SCP SCRRA SMAQ SOAR SOT SPM SSO TCA TEZ TIF TMO TMP TWMO UBM WHAR12 ZETI
15	Revision	p. 9, second paragraph under "Mobility"	Revise the last sentence and insert the word "safety." For example: "However, more work is needed to be better manage both the viability, safety , and reliability..."			
16	Correction	p. 10	RH column. SB 375 was passed in 2008, please delete reference to this as recently passed. "..With the more recent passage of SB 375."			
17	Clarification	p. 10; column 1; paragraph 1; last sentence	"SCAG will collaborate with federal, state and local partners to ensure that the implementation of the Plan helps address existing air-quality challenges, preserve most reasonably utilize natural lands and reduce GHG emissions."			
18	Comment	p. 12, first bullet point under "Focusing on Objectives"	Explain how SCAG aims to make transit the backbone of the transportation system? It seems to contradict the current state of our transit system – low ridership and public safety concerns.			
19	Clarification	p. 12; column 2; paragraph 1; sentence 1	"By 2050, the population of the region is projected <u>in the Plan</u> to increase by two million people, or 11 percent, with an increase of 1.6 million housing units, or 26 percent, and 1.3 million jobs, or 14.2 percent."			
20	Clarification	P. 12, column 2; paragraph 3	" <u>This plan projects that</u> s ixty-seven percent of new households and 55 percent of new jobs between 2019–2050 will be located in Priority Development Areas, either near transit or in walkable communities."			
21	Clarification	P. 13, column 2; paragraph 1; last sentence	"Within those elements, the Plan also strives to achieve broader regional objectives, such as increased housing production, improved equity and resilience, the preservation most reasonable utilization of natural lands, improvement of public health, increased transportation safety, support for			

SUB 1-27



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
			the region’s vital goods movement industries and more efficient use of resources.”
22	Clarification	p. 14 & p. 78	SCAG stated that it is not in charge of implementation, but the graphic and its presentation seems to imply that SCAG is a part of implementation. Make SCAG’s role more clear in that it is not in charge of implementation.
23	General comment	p. 26	This Plan includes strategies that were in 2020; therefore, not new ideas. Should Section 2 include a summary of how the last RTP/SCS performed. “Since approval of the 2020 RTP/SCS the region has made great progress in these areas...” What was the performance of the 2020 RTP? A summary of the 2020 RTP/SCS Progress provided on pages 178-179 should be summarized at the beginning of Chapter 2. Where are we at and what needs to be done? There was no initial summary at the beginning of the report, which would have been helpful.
24	Clarification	p. 29; paragraph 3 last sentence	“The history of <u>some</u> transportation and housing policies in both the United States and California demonstrates how racism in government...” “This data shows that 18.4 percent of fatal collisions in 2021 involved <u>non-Hispanic</u> Black victims, who represent just over 6 percent of the population.” <ul style="list-style-type: none"> • Is this 18.4% of walking and biking fatalities or all transportation fatalities? • Cite data source for fatalities.
25	Clarification	p. 31, column 1, paragraph 1	“The COVID-19 pandemic <u>and the response to it</u> impacted the way we live, work and play in the region—and we are still feeling those impacts today. When SCAG’s Regional Council adopted Connect SoCal 2020 for all purposes in September 2020...” <ul style="list-style-type: none"> • Clarify what “for all purposes” was Connect SoCal adopted.
26	Clarification	p. 31, column 1, paragraph 3; sentence 2	“The pandemic <u>response</u> provided additional shocks – a near-zero level of foreign immigration, fewer births and excess deaths from the pandemic itself.”
27	Clarification	p. 34, column 2, paragraph 2; last sentence	“These Guiding Principles should be considered as a starting point and <u>may be</u> used as building blocks that agencies and local jurisdictions can adapt to fit their unique needs when making informed decisions regarding emerging technology.” <ul style="list-style-type: none"> • Are agencies required to use these or adapt them for use?
28	Source	p. 35	Second paragraph under Climate Change, what is the source of the information provided.
29	Clarification	p. 38, column 1, paragraph 1; sentence 2	“We are home to an ... 109 miles local light rail, serving 108 stations, Amtrak intercity and long-distance services; ...” <ul style="list-style-type: none"> • Clarify 109 phrase
30	Clarification	p. 38, column 2	Add final statement: “ <u>Maps contained in Connect SoCal are for general reference and provide snapshots of the region. Please contact the appropriate agency for the most recent information.</u> ”
31	Clarification	p. 39, map 2.1	<ul style="list-style-type: none"> • Change “City boundary” in legend to date of city boundary, e.g., “January 1, 2023 City boundaries” • Freeway and highways are difficult to tell apart; change symbology. • Relabel Freeways to <u>Freeways/Toll Roads</u>



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none"> Add Year to title Define bottlenecks or add note referring reader to Technical Report if information is included in another Connect SoCal document.
32	Clarification	p. 40, map 2.2	<ul style="list-style-type: none"> Why is map labeled 2019/2022? Label each layer's year as applicable or add source notes. Add definitions of rapid bus and bus rapid transit or add note referring reader to where the definitions are.
33	Clarification	p. 41, map 2.3	<ul style="list-style-type: none"> Add year to title Change "City boundary" in legend to date of city boundary, e.g., "January 1, 2023 City boundaries" Freeway and class 1 bike lanes are difficult to tell apart; change symbology. Add definitions for lane classifications or refer readers to locations. Clarify the two sets of bike lanes Relabel Freeways to <u>Freeways/Toll Roads</u>
34	Clarification	p. 42, map 2.4	<ul style="list-style-type: none"> What data year is map displaying? Change "City boundary" in legend to date of city boundary, e.g., "January 1, 2023 City boundaries" Freeway and arterials are difficult to tell apart; change symbology. Relabel Freeways to <u>Freeways/Toll Roads</u>
35	Clarification	p. 45, paragraph 1; sentence 2	"Responses to the COVID-19 pandemic sparked changes in travel behavior and trends, which spotlight what is needed and what is possible for the future of transportation in our region."
36	Clarification	p. 47, column 2; paragraph 2	"The patterns that characterize our communities largely come down to housing and households. Over half of the region's 6.6 million housing units were built before 1980. <u>For the purposes of Connect SoCal, the category of "multi-family" residential units includes townhomes, which are defined by the State of California Department of Finance and the U.S. Census Bureau as single-family homes. The category Connect SoCal refers to as 'multi-family' units that are attached residences, including apartments, condominiums and townhouses. While 54 percent are single-family homes, 46 percent are multifamily homes such as condominiums, townhouses and apartments...</u> "
37	Clarification	p. 47, column 2; paragraph 2; sentence 4	"The predominant form of new housing construction has fluctuated over time—a function of the number of people entering their 20s and 30s (the main household formation years) and other aspects of the housing market, <u>including limited land availability in some parts of the region.</u> "
38	Clarification	p. 48, Figure 2.1	Is this the number of permits issued or number of units permitted? DOF doesn't report the number of permits in E-5 file.
39	Revision/Deletion	p. 49	Remove and/or revise the exhibit on this page. It appears that the region is building housing beyond the population growth needs.
40	Clarification	p. 49, column 1; paragraph 1; sentence 2	<p>"...In a high-cost urban megaregion with decreasing family sizes, the single-family-heavy skew of the current housing stock puts homeownership more out of reach for low- and moderate-income households, while also increasing overcrowding rates and travel distances."</p> <ul style="list-style-type: none"> Doesn't more single-family units increase the number of options for buyers, which result in a benefit through the ability to build equity?



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
41	Clarification	p. 49, column 2 figure	<ul style="list-style-type: none"> What was pattern of building 1950-1980? Did we overbuild, underbuild or right-size build? 2000-2020 "green" housing figures- does this imply we overbuilt in 2000-2020 period? Is assumption of 3.0 pphh appropriate?
42	Clarification	p. 51, map 2.5	<ul style="list-style-type: none"> Add to title "(Jobs per ___ square mile? ___)" Relabel Freeways to <u>Freeways/Toll Roads</u>
43	Clarification	p. 52, map 2.6	<ul style="list-style-type: none"> Add to title "(per ___ square mile? ___)" Relabel Freeways to <u>Freeways/Toll Roads</u>
44	Clarification	p. 53, map 2.7	<ul style="list-style-type: none"> Add data year to title Add link to where land use definitions are Explain if these are the consolidated land use categories and not the original jurisdiction maps
45	Clarification	p. 54, column 1; sentence 3	<p>"...Years of underbuilding has resulted in a shortfall in the number of units needed to house the region <u>comfortably</u> and created issues such as cost burden and overcrowding."</p> <ul style="list-style-type: none"> Define cost burden & include reference source/as defined by... Define overcrowding & include reference source/as defined by...
46	Clarification	p. 54, column 2; paragraph 2 sentence 1	<p>"The quantitative impacts of the housing crisis, such as overcrowding, cost burden and <u>low</u> home ownership, disproportionately burden communities of color."</p>
47	Clarification	p. 54, column 1; paragraph 1 sentence 5	<p>"Households that spend more than 30 percent of their income on housing are considered <u>cost-burdened</u>"overpaying" and will have less income to spend on both essential needs, such as food and transportation, and discretionary purchases."</p> <ul style="list-style-type: none"> "overpaying" is not the same as "cost-burdened"- overpaying is associated with the cost of the rent, not the share of income being paid on rent.
48	Clarification	p. 54, column 2; paragraph 1 sentence 1	<p>"A recent comprehensive study on the California homelessness crisis found that the majority (89 percent) of unhoused persons lived in California prior to becoming unhoused, and the primary factors leading to homelessness were economic or social."</p> <ul style="list-style-type: none"> List or define the "social" factors.
49	Clarification	p. 54, column 2; paragraph 2 sentence 1	<p>"Out-migration: While the region typically loses more residents to other states and counties than it gains, domestic out-migration increased notably early in the <u>COVID-19</u> pandemic. While slow or negative growth can reduce projected housing need, domestic out-migration reflects <u>several factors, including the inability or lack of desire</u> of Southern Californians to stay in the communities they call home. <u>Out-migration</u> is is one economic response to a too-small housing supply, alongside overcrowding, cost burden, becoming unhoused, and the suppression of life-cycle ambitions (e.g., household formation and homeownership)."</p>
50	Clarification	p. 56, column 1; paragraph 1 sentence 2	<p>"...Poor Local air quality and the lack of dependable transportation options, active transportation, affordable housing, health care and job opportunities in many SCAG region communities can lead to poor health outcomes."</p>



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
51	Clarification	p. 56, column 1; paragraph 2; sentence 1	“Natural lands (<u>see glossary for definition</u>) offer important benefits to the region, including capturing carbon emissions and recharging groundwater resources. However, natural lands have decreased by roughly 50,000 acres, or 0.2 percent, between 2012 and 2019. Farmland decreased by 40,000 acres, or 3.5 percent, between 2012 and 2018. While farming practices can contribute to GHG emissions, these are typically far less than emissions in urban environments, and farm and grazing lands can provide”
52	Clarification	p. 56, column 2; paragraph 3 sentence 4	These conditions are known as the Social Determinants of Health (SDOH), and they help explain why <u>some</u> health outcomes (e.g., rates of asthma or diabetes) vary widely across the region.”
53	Clarification	p. 56, column 2; paragraph 4 sentence 1	“The urbanization of the region over the past several decades has led to the consumption of hundreds of thousands of acres of natural land and farmland <u>to house and serve those residents.</u> ”
54	Clarification	p. 58, column 2; paragraph 1 last sentence	“Communities in the SCAG region that depend primarily on wage income are missing out on the economic prosperity suggested by the growth in GDP <u>by...</u> ” <ul style="list-style-type: none"> • How are they missing out?
55	Clarification	p. 59, Figure 2.3	Change title to “GDP Per Capita and Wage Income, 2010-2021”; current title is commentary.
56	Clarification	p. 59, column 1, sentence 2	“ Though the The region’s well-diversified economic base <u>is well-diversified</u> , it may not benefit all people in the region equally.”
57	Clarification	p. 61, map 2.8	Add data year to title
58	Clarification	p. 62, column 1, paragraph 1, last sentence	“This will likely put additional strain on <u>social, safety-net programs</u> retirement funding , including Social Security.”
59	Clarification	p. 64, column 2, paragraph 1, last sentence	“The program aims to build street-level community resiliency and increase the safety of people most harmed by traffic injuries and fatalities, prioritizing <u>non-Hispanic Black, Indigenous and other people of color;</u> ...”
60	Clarification	p. 64, column 2, paragraph 2, last sentence	“Sustainable Communities Program: SCAG helps to advance Connect SoCal through the Sustainable Communities Program (<u>SCP</u>), which has facilitated over \$16.9 million in funding to local jurisdictions since...”
61	Clarification	p. 65, column 1, paragraph 1	“Since Connect SoCal was adopted in 2020, transportation agencies and local jurisdictions have taken actions to <u>that</u> implement the Plan.” <ul style="list-style-type: none"> • Actions may or may not be specific to implementing Plan
62	Clarification	p. 65, column 1, paragraph 2, sentence 2	“In March 2021, SCAG adopted its 6 th cycle Regional Housing Needs Assessment (RHNA)—based on Connect SoCal <u>2020</u> ’s growth vision— by allocating units to cities and counties with the greatest job and ...”
63	Clarification	p. 65, column 1, paragraph 2, last sentence	“These actions represent the first time the state provided funding to regions to conduct the RHNA program and support regional housing-planning efforts.” <ul style="list-style-type: none"> • REAP funds were used for SCAG to do RHNA?
64	Clarification	p. 65, column 2, paragraph	“Since Connect SoCal was adopted in 2020, SCAG has gained new responsibility for the selection of transportation projects to be funded with



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		1, sentence 3 & page 67, column 2 callout text in green	federal revenue sources, such as CMAQs, STBG, and CRP. SCAG’s project selection process follows a performance-based evaluation and selection approach—and ensures that selected projects further Connect SoCal goals.” <ul style="list-style-type: none"> • SCAG has the power to provide funding for transportation projects? Please provide examples.
65	Correction	p. 68, column 3, paragraph 1, sentence 2	“Because the elements of the PACT were developed jointly, residents were uniquely empowered to cohesively develop their vision for active mobility and recreation in Riverside manner and then codify it through the Complete Streets Ordinance.” <ul style="list-style-type: none"> • “...in Riverside manner” sentence is incomplete
66	Correction	p. 69, column 1, paragraph 1, sentence 2	“The grant application consists of ... at twenty-four at 24 intersection locations.”
67	Clarification	p. 77, column 2, paragraph 3	“SCAG develops a forecasted development pattern that details where future jobs and housing are projected to will be located, based on expert projection, existing planning documents, regional policies, and review <u>and input</u> by local jurisdictions.”
68	Clarification	p. 78	“Implementation: Jurisdictions take action at the local level that may to implement work that move[s] toward achieving this regional vision.”
69	Clarification	p. 79, column 1, paragraph 2, sentence 1	“Consistency and consultation: During the development of the Plan, SCAG reviewed thousands of planning documents. These documents were developed <u>in part</u> by cities, counties and transportation agencies to review <u>promote</u> consistency between local plans, the Regional Transportation Plan, and federal and state documents like the California Transportation Plan.”
70	Clarification	p. 79, column 2, paragraph 1, sentence 2	“SCAG partnered with 16 community-based organizations, attended 20 pop-up events and collected over 3,600 survey responses.” <ul style="list-style-type: none"> • Please clarify if this is the number of respondents or number of questions answered by respondent providing answer. It is misleading if the answer is the latter and should be clarified.
71	Clarification	p. 80, column 1, paragraph 2, sentence 4	“Consistent with global trends, the older-age population of the SCAG region is steadily growing. Understanding this demographic shift is vital for planning for the future. We want to better comprehend how an older population will live and travel—and how we can ensure they continue to fully engage in their communities. One of the clearest ramifications <u>implications</u> is <u>seen</u> in housing demand. Older people tend to live alone or in smaller households. Other major ramifications <u>implications</u> include...”
72	Clarification & Correction	p. 81 Table 3.1	Add note: “Numbers may not sum to total due to rounding.” Noting the above, the SCAG totals in Table 3.1 and in Table 12 of the Demographics Technical Report do not match—though the county totals do match. The SCAG totals should match across tables and documents.
73	Clarification	p. 82, column 3, paragraph 2, sentence 1	“Reconnecting Communities: Historic physical and economic segregation was caused by <u>some</u> U.S. housing and transportation policies and led to decades of inequalities. We are <u>now</u> planning policies and projects that involve removing, retrofitting or mitigating highways or other transportation facilities that create barriers...”



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
74	Clarification	p. 83, column 1, paragraph 2, last sentence	"This program builds street-level community resilience and increase the safety of people most harmed by traffic injuries and fatalities, including without limitation, <u>non-Hispanic Black</u> , Indigenous and <u>other People of Color</u> ; ..."
75	Clarification	p. 83, column 2, paragraph 2, sentence 1	"Inclusive Economic Recovery Strategy (IERS): This report was developed to address the long-standing social and economic challenges heightened by the <u>responses to the COVID-19 pandemic</u> ."
76	Clarification	p. 85, column 1, paragraph 1, last sentence	"The following goals and subgoals will help <u>the SCAG region</u> to achieve this vision:"
77	Clarification	p. 87, first paragraph Mobility Stories	Is the Spring 2023 public outreach survey statistically significant? If not, it would not be an accurate statement to say there is pent up demand for more travel options as the survey data does not capture an accurate sample of the region. If anything, there is pent up demand for travel options for people who took the survey. Explain how a freshman at Santa Ana College (SAC) relies on OC streetcar to get to class. OC Streetcar is not near SAC.
78	Clarification	p. 89	Funding the System/User Fees This paragraph discusses "user fees." Clarify if this is essentially a VMT tax.
79	Clarification	p. 91, column 1, paragraph 1, sentence 3	"But capital investment alone is not sufficient to achieve our vision for the region's future or meet our greenhouse gas (GHG) emission reduction goals <u>set by CARB</u> ."
80	Correction	p. 91, column 1, paragraph 1, sentence 2	"Connect SoCal 2024 increases investment and strengthens policy levers to optimize system performance while realizing greenhouse gas <u>reduction reductions</u> quickly and efficiently."
81	General Comment	p. 92	Retitle "Regional Express Lanes Network" to <u>Regional Express Lanes, HOT and Toll Lane Network: The Priced Transportation Network</u> . The text should then provide brief definitions of each type of facility that makes up the priced transportation network, as express lanes, toll roads and HOT lanes each operate differently.
82	Clarification	p. 94, map 3.1	<ul style="list-style-type: none"> • Add data year to title for Planned Transit Network • The Rapid Bus and Bus Rapid Transit routes are not legible. Additionally, explain where the "SCAG 2022" source derives from.
83	Clarification	p. 95, map 3.2	<ul style="list-style-type: none"> • Add data year to title • Retitle "Regional Express Lanes Network" to <u>Regional Express Lanes, HOT and Toll Lane Network: The Priced Transportation Network</u>.
84	Clarification	p. 96, column 1, paragraph 2, sentence 3	In the following decade, <u>these</u> this grew <u>by</u> 4.3 percent and 7.0 percent, respectively, sometimes <u>as in more</u> infill or <u>more</u> location-efficient places than in decades prior."
85	Clarification	p. 96, column 2, paragraph	"While the ultimate oversight for this land-use law is the purview of the State Housing and Community Development Department, the allocation methodology was developed and adopted by SCAG's Regional Council with a



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		1, sentence 2-3	clear intent to align regional housing and the climate vision embedded in SCAG’s <u>2020 RTP/ SCS</u> . In contrast to past cycles when RHNA followed anticipated future population growth, the majority of the <u>unit need target</u> (836,857) units was allocated to address existing housing need during the 6th cycle.”
86	Clarification	p. 97, column 1; paragraph 3; sentence 1	“As part of developing a Sustainable Communities Strategy per Senate Bill 375 (SB 375), SCAG must include a “forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies...” will enable SCAG to reach its GHG emission reduction target of 19 percent below 2005 levels by 2035, <u>if feasible.</u> ”
87	Clarification	p. 97, column 1, paragraph 1, sentence 3	“For SCAG’s purposes, this represents a framework for making our <u>jurisdictions cities</u> more inclusive, more equitable and more efficient by providing a range of mobility options and overall reduction in...”
88	Clarification	p. 97, column 2	<p>Add the consistency language to end of page: “In order to assess the ability of the Connect SoCal 2024 Plan to meet federal air quality standards and achieve a state greenhouse gas reduction target, SCAG creates small-area projections data for housing, population, and employment, which are known as the Tier 2 traffic analysis zone (TAZ) socioeconomic dataset (SED). Although these data are based in part on input provided by staff from local jurisdictions during the Connect SoCal 2024 Local Data Exchange process, local jurisdictions and projects within the region shall not be held to meet any specific numbers within or aggregates of the TAZ data. Connect SoCal 2024’s TAZ-level household and employment projections are created to provide estimated snapshots in time. These projections do not reflect subsequently available information (given that local jurisdictions provided their local input to SCAG between May and December 2022); and, concerning some jurisdictions, they also do not reflect all currently entitled and pending projects. Additionally, the TAZ data do not project the full build-out and realization of localities’ general plans; and they do not conform to jurisdictions’ current respective housing elements. The local plans and approvals have continued and will continue to evolve; and market forces will continue to play a major role in determining the timing, locations, and different types of development and redevelopment that will occur. Therefore, the applicable jurisdiction(s) should be contacted for the most up-to-date data available.</p> <p>The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.</p>



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			<p>SCAG’s forecasted regional development pattern (FRDP) is not solely based on the TAZ-level household and employment spatial projections. It is utilized to estimate the overall effect of the many policies, goals, and strategies of Connect SoCal—which should not be uncritically applied, individually or en masse, to any particular project or plan. The TAZ-level household and employment growth projections support the region’s ability to model conformity with federal air quality standards and its ability to achieve a state greenhouse gas reduction target; they do not, however, reflect the only set of growth assumptions that may meet these standards and that target.</p> <p>Therefore, insofar as housing and other laws or grants may require comparisons of projects or plans to Connect SoCal 2024, SCAG’s projections that are illustrated in TAZ maps—along with any related documents or modeling outputs—may not be used to determine the inconsistency of any plan or project in the region with Connect SoCal 2024. Given that land use decisions are properly made with attention to local contexts and circumstances, local jurisdictions and other lead agencies shall have the sole discretion to determine a local project’s or plan’s general consistency and overall alignment with Connect SoCal.</p> <p>For example, local jurisdictions’ plans and approvals may be found to align with Connect SoCal 2024 if they directionally support a number of its objectives, such as by encouraging a mix of housing types that includes more affordable and multi-family housing rather than solely single-family, for-sale housing; providing for more housing located proximate to employment or vice versa; or encouraging increased use of transit, ridesharing, biking, walking or micro-mobility, or hybrid and remote work to reduce commuting trips. Such alignment is an appropriate basis for a local jurisdiction to determine that a plan or project is consistent with Connect SoCal 2024. Such determinations should be evaluated based on (i) the totality of the goals, policies, and objectives of Connect SoCal 2024 and its associated Program Environmental Impact Report (PEIR), and (ii) the attributes of the local project or plan in overall relation to Connect SoCal, and not in a prescriptive manner by applying SCAG’s TAZ-level data, any aggregate thereof, or any particular one or more goals, policies, or objectives of Connect SoCal 2024 and its associated PEIR.</p> <p>This flows logically from the fact that Connect SoCal 2024 includes dozens of stated directives, policies, goals, objectives, and measurements, any number of which may not be individually applicable to any given project or plan. For example, a project that provides new housing units in conformity with a jurisdiction’s approved housing element can and should be found to be in overall alignment with Connect SoCal 2024 given housing production’s contribution to Connect SoCal 2024 goals and policies, especially those related to affirmatively furthering fair housing, social and economic justice, jobs-housing balance, and the like.</p>



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			Household or employment growth included in the Connect SoCal 2024 TAZ-level SED and maps may assist in determining consistency with the SCS for purposes of determining a project’s eligibility for CEQA streamlining under SB 375 (Cal. Govt. Code § 21155(a)). TAZ-level maps and data may not otherwise be used or applied prescriptively to determine that a project is inconsistent or not in alignment with Connect SoCal 2024 for any purpose, given that myriad other development assumptions could also be found to be consistent or, on balance, aligned with the SCS. Specifically, the TAZ-level data and maps do not supersede or otherwise affect locally approved housing elements, including those adopted in compliance with the 6th Cycle of the Regional Housing Needs Assessment (RHNA).”
89	Clarification	p. 98, map 3.3	<p>Forecasted Regional Development Pattern map shows growth increment of 2019-2050.</p> <ul style="list-style-type: none"> • Why does this show growth instead of Year 2050 densities? • Remove map or Replace map with Year 2050 densities. • If map is kept, add language “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.” • Relabel Freeways to <u>Freeways/Toll Roads</u> • Add “Growth, 2019-2050” to title
90	Correction	p. 99, column 2, paragraph 1, sentence 1	“The Regional Housing Needs Assessment <u>Allocation</u> process takes place every eight years, as required by state law, or every other RTP/ SCS cycle.”
91	Clarification	p. 97, column 1, paragraph 1, sentence 3	<p>“PDAs are based on both existing conditions and future infrastructure, meaning that their boundaries reflect a snapshot in time based on data available at the time of Plan development. As such, these boundaries reflect a guide, and the location of PDAs used by local jurisdictions or for various programs or grants may differ.”</p> <ul style="list-style-type: none"> • Sentence unclear. Possibly reword sentence or explain how do the PDA boundaries reflect a snapshot in time. • How do the PDA ‘boundaries reflect a guide’?
92	Clarification	p. 101, column 1; paragraph 2; last sentence	“As a result, <u>this Plan projects that</u> only 7 percent of the region’s future household growth will be located in SOIs outside of incorporated city boundaries from 2019 to 2050.”



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93	Clarification	p. 102, map 3.4	<ul style="list-style-type: none"> Add data year to title The map is not legible; thus, we cannot properly comment on PDA locations. Additionally, explain the “SCAG 2023” derives from.
94	Clarification	p. 103, column 1, paragraph 3, sentence 2	“Therefore, SCAG’s approach of de-emphasizing growth in areas with the highest number of convergences is sensitive to market considerations, <u>though some growth may still occur.</u> ”
95	Clarification	p. 103, column 2, paragraph 4, sentence 2	“These areas at risk of interface fire losses are referred to by law as “Fire Hazard Severity Zones” (FHSZ).” <ul style="list-style-type: none"> What are “interface fire losses”?
96	Clarification	p. 104, column 1, paragraph 2	“Endangered Species and Plants: Location and condition of species of rare and sensitive plants, animals and natural communities in California, <u>see regulatory agencies, such as U.S. Fish and Wildlife.</u> ” <ul style="list-style-type: none"> SCAG should defer to regulatory agencies for definitions and regulations
97	Clarification	p. 104, column 1, paragraph 4	“Natural Community and Habitat Conservation Plans: (<u>NCCP and HCP</u>) These plans identify and provide for the regional protection of plants...”
98	Clarification	p. 105, map 3.5	<ul style="list-style-type: none"> Add data year to title Relabel Freeways to <u>Freeways/Toll Roads</u>
99	Clarification	p. 106, column 1, paragraph 1, sentence 3	“However, we know that alleviating the severity of the housing crisis requires a <u>considerable</u> comiserate commitment of resources.”
100	Clarification	p. 109, column 1, paragraph 1, sentence 3	“The region must rise to meet the moment by investing in the adequate supporting infrastructure for all vehicle classes.” <ul style="list-style-type: none"> Reword “rise to meet the moment”
101	Clarification	p. 109, column 1, paragraph 2, sentence 3	“However, both financial, <u>supply</u> , and infrastructure barriers are keeping many people in the region from transitioning to clean transportation.”
102	Clarification	p. 109, column 1, paragraph 3, sentence 3	“Low-income communities are the most impacted from older-vehicle emissions, and an additional rebate program could serve to both accelerate the transition to cleaner vehicles and ensure that the related health <u>benefits</u> also benefit SCAG’s Priority Equity Communities.”
103	Clarification	p. 111, column 2, last paragraph, sentence 2	“By investing in a more efficient goods movement network, Universal Basic Mobility and improved access to recreational trails, <u>the SCAG region</u> is not only making broad improvements to the general regional economy but is focusing specifically on areas of disparity...”
104	Clarification	p. 111, column 1	“12. Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the existing transportation system instead of adding roadway capacity, where possible ”
105	Clarification	p. 117, column 1	Add new under 41: “Support a mix of housing types throughout the region to support access for all levels of income—including single-family detached homes—to increase opportunity for equity-building through home-ownership for lower-income households.
106	Clarification	p. 118, column 1	“49. <u>Promote</u> Implement the Forecasted Regional Development Pattern of Connect SoCal 2024, consisting of household and employment projections that have been reviewed and refined by jurisdictions and stakeholders to advance this shared framework for regional growth management planning”



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107	General comment	p. 119	Climate resilience policies seem to be lacking as far as transportation infrastructure is concerned. Consider policies here that encourage: -embedding climate resilience into transportation infrastructure planning and management -transportation infrastructure capital investments and innovation to scale climate resilience -help communities achieve resilience, safety, health, equity and economic vitality
108	Comment	p. 121, Regional Planning Policy #89 (Tourism)	Encouraging alternative modes of transportation for tourist traveling to the SCAG region does not seem feasible. What other modes of transportation would allow a visitor to easily travel from the airport to the city, to the mountains, to the beach?
109	Clarification	p. 121, column 1	“81. Promote <u>an increased variety of</u> payment credentials for disadvantaged community members and the transition of cash users to digital payment technologies to address payment barriers” <ul style="list-style-type: none"> • What are “payment credentials”?
110	Clarification	p. 121, column 2	“89. Encourage the reduced use of cars by visitors to the region by working with state, county and city agencies to highlight and increase access to <u>safe</u> alternative options, including transit, passenger rail and active transportation”
111	Clarification	p. 123, column 1; paragraph 1	Add clarification information for the table starting on page 124 by inserting following to page 123’s first paragraph: <u>Note that the list of other responsible parties is not exhaustive. The strategies starting on the following page identify areas where SCAG can:</u> <ul style="list-style-type: none"> • <u>Lead: SCAG may act as a collaboration leader, advocate on state or federal legislation and/or initiate new research in furtherance of SCAG’s policies and goals. SCAG already has or will begin to move forward on this strategy.</u> • <u>Partner: SCAG may provide technical assistance or grant resources to jurisdictions, agencies, organizations, and other entities in furtherance of SCAG’s policies and goals. Successful implementation of the strategy will depend on other governments, agencies or organizations, and entities. SCAG already has or will begin to move forward on this strategy.</u> • <u>Support: SCAG will provide ongoing support (toolbox Tuesday, provide subject matter expert presentations to elected officials, letters of support in grant applications) to efforts led by other agencies or organizations. While SCAG does not have a direct and tangible role to move forward on this strategy, it remains engaged to provide continued support to advance projects that further SCAG’s policies and goals.</u>
112	Clarification	p. 124	<ul style="list-style-type: none"> • Add table number and table title • Add asterisk to “Other Responsible Parties*” and display footnote on each page: “<u>List of parties is not exhaustive</u>”
113	Correction	p. 124	First strategy – consider adding “performance” to “..regional performance targets..”to denote an ongoing process of monitoring and adaptive management.
114	Revision	p. 124, Mobility,	Revise the Strategy #4, SCAG should not take the lead in developing a complete streets network. This type of effort would require



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		Complete Streets Strategy	
115	Clarification	p. 125	Strategy #6. SCAG role, Partner? (Maybe Support?) SCAG has no land use authority, what would SCAG's role be as Partner.
116	Clarification	p. 125	Strategy #9. Not clear what this strategy entails
117	Clarification	p. 125, 128, 129, 132 Table footnote	“(Asterisks) denote strategies that support quantified GHG emission strategies that help to reach SCAG’s <u>greenhouse gas reduction target set by CARB.</u> ”
118	Clarification	p. 126	Strategy #3. What’s the purpose of developing more TMAs/TMOs? Is this in areas where none TMA’s exist? Does CTC initiate this?
119	Correction	p. 127	Strategy #s 5 and 8. Add Transit/Rail Agencies to “Other Responsible Parties” or add an asterisk to say the list of agencies under “Other Responsible Parties” is not exhaustive (unless if others feel its implied)
120	Clarification	p. 128	Strategy #4. This is the only Strategy under which, “Toll Authorities” are mentioned. How are toll authorities defined?
121	Clarification	p. 129, line 2 (second item under Priority Development Areas)	“ Develop <u>Support</u> housing in areas with existing and planned infrastructure and availability of multimodal options, and where a critical mass of activity can promote location efficiency.” Change from “partner” to “support.”
122	Clarification	p. 129	Strategy #1. SGC under Other Responsible Parties. Define at first use. (Strategic Growth Council)
123	Clarification	p. 129	Strategy #5, households of color, should this be BIPOC (Black, Indigenous and People of Color)
124	Clarification	p. 131	Strategy #s 2 and 7 No other responsible parties? Local jurisdictions. Private sector companies?
125	Clarification	p. 132	Strategy # 1. The strategy is for PPP but Private Sector Companies are not identified in the Other Responsible Parties
126	Clarification	p. 132	Strategy # 2. The strategy is to assist local jurisdictions, but the SCAG role disposition is “Lead” Consider changing to Support or Partner
127	General comment	p. 132	Natural and Agricultural Lands Preservation. While part of “natural lands” wetlands, due to their importance in the ecosystem should be called out. For example, ref to “..conserve and restore <u>wetlands</u> , natural and agricultural lands..” [The PEIR defines <i>Natural lands as Biologically diverse landscapes such as forested and mountainous areas, shrub lands, deserts and other ecosystems which contain habitat that supports wildlife and vegetation</i>].
128	General comment	p. 132	Strategy #6. RAMP VMT mitigation. “Work with implementation agencies to support, establish or supplement <u>elective</u> regional advance mitigation programs (RAMP) for regionally significant transportation projects to mitigate environmental impacts, reduce per-capita VMT and provide mitigation opportunities through the Intergovernmental Review Process”
129	General comment	p. 132	Strategy #8. Consider rewording to be consistent with Policy #62 on p119, you typically don’t restore wildlife corridors. Suggest, “Support the integration of nature-based solutions into implementing agency plans to address urban heat, organic waste reduction, <u>protect and restore wetlands</u> ”



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			and natural habitats, habitat and wildlife corridor restoration, greenway and wildlife connectivity and similar efforts.”
130	General comment	p. 133	Strategy #2. SCAG role should be Partner/Support since local jurisdictions are responsible for developing their own CAPs
131	Clarification	p. 134	Strategy #2. Clarify if MSRC is a SCAG committee
132	Clarification	p. 134	Strategy #8. Who issues the regional/statewide universal permit?
133	Clarification	p. 135, column 1	“Continue to develop an understanding of low-income travel patterns and needs, and the impact of shocks (e.g., COVID <u>pandemic response</u> and telework adoption) on low-income travel”
134	Clarification	p. 138	“This chapter ... to meet milestones to implement Connect SoCal <u>2024.</u> ”
135	Clarification	p. 139; all pages	“FIGURE 4.1 FY <u>2024/25</u> –FY <u>2049/50</u> RTP/SCS Revenues (in Nominal Dollars, Billions)” <ul style="list-style-type: none"> • Add full fiscal year identifiers to clarify the years covered in all figures and references
136	Clarification	p. 139; all references to SCAG Financial Model 2023	“SCAG <u>Connect SoCal</u> Financial Model 2023 <ul style="list-style-type: none"> • Add Connect SoCal reference to sources regarding financial model • P. 150, 154, 155, 156, 171
137	Clarification	p. 139; Figure 4.2	“ <u>Operations and Maintenance (O&M) Transit</u> ”
138	Clarification	p. 135; column 2, sentence 2	“The COVID-19 pandemic <u>response</u> has had a significant impact on travel patterns and economic activity, and...”
139	Clarification	p. 144; Figure 4.3	<ul style="list-style-type: none"> • “FIGURE 4.3 Historical Inflation Trends (<u>Year-Over-Year Annual Inflation</u>)” • Add label “Inflation” to Y-axis • Why is inflation only through 2019? • X-axis only shows to 2018
140	Clarification	p. 145; Figure 4.4	Add label “Index (2020=100)” to Y-axis
141	Clarification	p. 146; column 1; paragraph 1; sentence 2	“Suppressed consumer spending during the initial pandemic <u>response</u> period resulted in significant declines in retail sales <u>due to shutdowns in response to the pandemic</u> . Likewise, recessions and economic slowdowns also reduce personal consumption.”
142	Clarification	p. 146; column 1; paragraph 2; sentence 2	“...Though changes in regional vehicle miles traveled will continue to play a role during the Plan period, increases in conventional fuel efficiency and the adoption of alternative fuel and alternative-powered vehicles will reduce overall fuel consumption.” <ul style="list-style-type: none"> • What is the reference to “regional” vehicle miles traveled?
143	Clarification	p. 146; column 2; paragraph 3; sentence 1	“At the time of the <u>2024</u> Connect SoCal Plan, three decades have passed without substantive Congressional agreement on a long-term solution...”
144	Clarification	p. 153; Table 4.2	<ul style="list-style-type: none"> • Replace “Total” with “SCAG Region” at bottom of table. • Add note that fiscal year indicates the date the fiscal year ends • Right-justify all data columns.
145	Correction	p. 154; column 1; paragraph 1; sentence 2	“The share of state sources (32 percent) is relatively unchanged since the <u>2020</u> last RTP/SCS.”



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
146	Clarification	p. 154; Figure 4.8	<ul style="list-style-type: none"> Add population share of region into the legend showing the share of revenue.
147	Clarification	p. 157; column 2; paragraph 1; sentence 5	<p>"... These factors include technology and associated privacy issues, cost of implementation and administrative methods for fee collection/revenue allocation and potential equity concerns."</p> <ul style="list-style-type: none"> Add Oxford comma to clarify which statement is accurate: These factors include technology and associated privacy issues, cost of implementation, and administrative methods for fee collection/revenue allocation and potential equity concerns." These factors include technology and associated privacy issues, cost of implementation and administrative methods for fee collection/revenue allocation, and potential equity concerns."
148	Clarification	p. 159; column 2; Local Road Charge Program	<p>"Local road charge program assumes a \$0.020 (in 2019 dollars) per mile charge throughout the region that can be implemented on a county basis."</p> <ul style="list-style-type: none"> How would this be done for residents vs. visitors?
149	Correction	p. 160; column 2	<p>"Transportation Development Act (TDA)... Description: The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> cent sales tax on retail sales statewide."</p>
150	Correction	p. 162; column 2; RMRA sentence 2	<p>"Description: The RMRA... Although the RMRA also provides SHOPP funding, for purposes of the <u>2024 2020</u> RTP/SCS financial plan, it only reflects the portion directed to counties and cities."</p>
151	Clarification	p. 168; column 1; sentence 2	<p>"Efforts are underway to explore transition from our current fuel tax-based system based to a more direct system of road user fees."</p>
152	Clarification	p. 174; paragraph 2	<p>"The Connect SoCal 2024 performance monitoring program integrates federal transportation system performance management and Equity/Environmental Justice measures and metrics specific to a set of federal transportation conformity planning, reporting requirements for designated criteria air pollutants and to support the achievement of regional greenhouse gas emissions reduction targets established by the California Air Resources Board."</p> <ul style="list-style-type: none"> Sentence is incomplete
153	Clarification	p. 178; column 4	<p>"\$1.00 < \$2.00 <u>\$1.00 = \$2.00</u></p> <p>INVESTMENT BENEFIT \$754 <u>Average</u> Annual Transportation Cost Savings per Household 277,800 <u>Average</u> Annual New Jobs from Transportation Investments 480,100 <u>Average</u> Annual New Jobs from Transportation Investments and Increased Competitiveness"</p>
154	Clarification	p. 182; paragraph 2; sentence 2	<p>"Improving the region's mobility and enabling more sustainable development can provide a myriad of co-benefits, including reduced energy and water use."</p>
155	Clarification	p. 183; column 2; paragraph 1; sentence 3	<p>"A livable community is defined by a cohesive, <u>physically</u> active and engaged population."</p>



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
156	Clarification	p. 186; column 1; paragraph 2; sentence 3	“However, decreased travel during the <u>shutdowns</u> in response to the <u>COVID-19</u> pandemic most likely helped the achievement of the 2020 target, so continued effort will be necessary to sustain progress and Plan implementation to reach the 2035 target.”
157	Clarification	p. 188; column 1; paragraph 2; sentence 2	“The increased competitiveness and improved economic performance <u>created induced</u> by these expenditures will generate an additional 202,300 jobs per year <u>on average</u> due to enhanced network efficiency.”
158	Clarification	p. 188; column 2; paragraph 1; sentence 2	“The purpose of the Equity Analysis is to evaluate the potential impacts of the implementation of the Plan on communities, including both protected populations, as defined by federal regulation, and priority communities, as identified by SCAG and regional stakeholders. The preparation of the <u>Plan report</u> relied heavily...” <ul style="list-style-type: none"> • Define ‘protected populations’ and ‘priority communities’
159	Clarification	p. 188; column 2; paragraph 2; sentence 1	“One method SCAG used to determine if the Plan caused disproportionate and adverse impacts to historically marginalized and disadvantaged communities is through the identification and assessment of Priority Equity Communities. <ul style="list-style-type: none"> • Define ‘historically-marginalized community’
160	Clarification	p. 188; column 2; paragraph 2; last sentence	“For more detail on the methodology used to develop Priority Equity Communities, see the Equity Analysis <u>in Section... or in Technical Report...</u> ”
161	Clarification	p. 189; Map 5.1	<ul style="list-style-type: none"> • Add year to title • Add note to map: “Priority Equity Communities are census tracts in the SCAG region that have a greater concentration of populations that have been historically marginalized and are susceptible to inequitable outcomes based on several socioeconomic factors.”
162	Clarification	p. 191; column 2; line 4	“Number of <u>jobs???employers???employments</u> reachable within <u>15-3015/30</u> minutes by automobile and <u>15-4515/45</u> minutes by transit during morning peak period (6 a.m.–9 a.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”
163	Clarification	p. 191; column 2; line 5	“Number of retail establishments reachable within <u>15-3015/30</u> minutes by automobile and <u>15-3015/30</u> minutes by transit during the midday period (9 a.m.–3 p.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”
164	Clarification	p. 191; column 3; line 1	“This analysis confirmed <u>the</u> typical patterns <u>that of</u> higher income transit riders tend to ride the train, while lower income transit riders tend to ride the bus. <u>Non-Hispanic</u> Black travelers had the lowest automobile mode share, while Hispanic/Latino and <u>non-Hispanic</u> Asian travelers had the highest. <u>non-Hispanic m</u> Multiracial travelers reported the highest walking and biking mode shares.”
165	Clarification	p. 191; column 3; line 2	“Results anticipate increases in miles traveled on transit and decreases in miles traveled by auto in accordance with the integrated transportation and land use strategies proposed in Connect SoCal. There are slightly greater decreases in person miles traveled for lower income quintiles and for <u>non-Hispanic</u> Black and <u>non-Hispanic</u> Asian travelers.”



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
166	Clarification	p. 191; column 3; line 3	“Results anticipate increases in time spent on transit and decreases in time spent traveling by auto in accordance with the integrated transportation and land use strategies proposed in Connect SoCal. There are slightly greater decreases in person hours traveled for higher income quintiles and for Hispanic/Latino and <u>non-Hispanic White</u> travelers.”
167	Clarification	p. 191; column 3; line 4	“Access to jobs is expected to improve for the overall population in the region and in Priority Equity Communities, however, there are several decreases in auto access to jobs for specific populations in Priority Equity Communities, including <u>non-Hispanic Black</u> , Hispanic/Latino, the two lowest income quintiles, and households below the Federal Poverty Level, limited-English proficiency population, and zero-vehicle households.”
168	Clarification	p. 191; column 3; line 5	“Access to shopping is expected to improve for the overall population in the region and in Priority Equity Communities, however, there are slight decreases in auto access for the <u>non-Hispanic Black</u> population and in bicycle access for the Hispanic/Latino population in Priority Equity Communities.”
169	Clarification	p. 192; column 2; line 1	“Percent of population that can reach a park location within <u>15-30</u> 15-30 minutes by automobile and <u>15-30</u> 15-30 minutes by transit during the midday period (9 a.m.–3 p.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”
170	Clarification	p. 192; column 2; line 2	“Number of schools within <u>15-30</u> 15-30 minutes by automobile and <u>15-30</u> 15-30 minutes by transit during morning peak period (6 a.m.–9 a.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”
171	Clarification	p. 192; column 2; line 3	“Number of health care facilities within <u>15-30</u> 15-30 minutes by automobile and <u>15-30</u> 15-30 minutes by transit during the midday period (9 a.m.–3 p.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”
172	Clarification	p. 192; column 3; line 1	“...The largest decreases are for <u>non-Hispanic</u> Hawaiian-Pacific Islander and <u>non-Hispanic</u> Native American populations where the decrease in auto access in Priority Equity Communities exceeds the regional change; and for the <u>non-Hispanic</u> Native American population where the decrease in bicycle access in the region exceeds the decrease in Priority Equity Communities. ”
173	Clarification	p. 192; column 3; line 2	“Access to schools... while transit access decreases for <u>non-Hispanic Black</u> people and zero-vehicle households in the region but increases for the same populations in Priority Equity Communities. ”
174	Clarification	p. 192; column 3; line 3	“Access to healthcare... except for auto decreases for <u>non-Hispanic Black</u> and Hispanic/Latino populations, all but the highest income quintile, and all other priority populations analyzed in Priority Equity Communities, despite increases at the regional level. ”
175	General comment	p. 193	The section on “Other Freeway or Expressway” should be expanded to include a detailed coding of the region’s freeway system (mixed-flow lane, auxiliary lane, HOV lane, HOT lane, toll lane, <u>toll roads</u> , etc.)
176	Clarification	p. 193; column 3; line 3	“Gentrifying neighborhoods and those with high eviction filings had higher percentages of <u>non-Hispanic Black</u> and Hispanic/Latino people...”
177	Clarification	p. 193; column 3; line 4	“In the base year, there is a higher concentration of low-income <u>people???</u> households???and some people of color in areas adjacent to railroads and railyards, and it is expected that this concentration <u>may</u> could grow in the Baseline and Plan scenarios. SCAG anticipates nominal Plan



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
			impact, and that population changes would generally follow that of the SCAG region.”
178	Clarification	p. 194; column 3; line 1	“The forecasted growth patterns included in the Plan reduced risks for <u>non-Hispanic</u> Asian households in earthquake zones, nominal changes to existing exposures to sea level rise, wildfires, extreme heat, drought and earthquake hazards. Although impacts from climate-related hazards are not always geographically isolated, overall <u>non-Hispanic</u> White populations reside disproportionately in climate hazard zones.”
179	Clarification	p. 194; column 3; line 3	“...In 2050, <u>non-Hispanic</u> Asian and foreign-born populations are expected to grow in freeway-adjacent areas, though there are no significant differences with the Plan. Emissions reductions in freeway-adjacent areas are significant compared to the share of the region’s total land area, but the Plan impact is still expected to be more pronounced in the region, compared to the freeway-adjacent areas, including areas that overlap with Priority Development Areas. <u>Non-Hispanic</u> Black...”
180	Correction	p. 195	Map 4-1. The Toll Roads in Orange County are not Interstate Highways, suggest adding a Toll Roads category or code as Other Freeway
181	Clarification	p. 195; column 3; line 1	“Increased air passenger demand itself has not resulted in increased aviation noise exposure, as increased air passenger activity but reduced aircraft operations have resulted in reduced aircraft noise.” <ul style="list-style-type: none"> • Sentence is incomplete; please reword
182	Clarification	p. 195; column 3; line 4	“The Plan is expected to invest a greater proportion into projects that benefit the lowest income quintile, and <u>non-Hispanic</u> White, <u>non-Hispanic</u> Black and people who identify as another race (i.e., <u>non-Hispanic</u> Native American, <u>non-Hispanic</u> Native Hawaiian/Pacific Islander, some other <u>non-Hispanic</u> race alone, and two or more <u>non-Hispanic</u> races) compared to other income quintiles and Hispanic/Latino and <u>non-Hispanic</u> Asian populations.”
183	Clarification	p. 196; column 3; line 1	“... Taxes that help fund projects in the Plan are expected to fall more heavily on <u>non-Hispanic</u> White and <u>non-Hispanic</u> Asian households.”
184	Clarification	p. 197; column 1; sentence 4	“...Connect SoCal 2024 investments by race and ethnicity are more complicated; the Plan is expected to spend more on projects that <u>non-Hispanic</u> White and <u>non-Hispanic</u> Black people are more likely to use compared to Hispanic/Latino and <u>non-Hispanic</u> Asian travelers.”
185	Clarification	p. 199; column 2	“Active Transportation (<u>AT</u>) – ...”
186	Clarification	p. 200; column 1	“ADU – Accessory Dwelling Unit – A <u>space</u> , room or set of rooms in a <u>residential unit</u> single family home (and in a single family zone) that has been designated or configured to be used as a separate dwelling unit and has been established by a permit.”
187	General comment	p. 201	The Regional Express Lanes Network discussion should be expanded to include HOT lanes and Toll Roads. Orange County Toll Roads are not categorized as express or HOT lanes, but collect tolls as a means of insuring low-emission, free-flow capacity and funding the construction and operation of the facility. TCA-operated Toll roads integrate with express lane and HOT lane facilities via the common FasTrak technology that allows inter-operability and convenience for drivers



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
188	Clarification	p. 202; column 1	"CARB – California Air Resources Board (<u>ARB</u>) – California state..."
189	Clarification	p. 202; column 2	"CEHD – ... This committee reviews projects, plans and programs of regional significance for consistency and conformity with applicable regional plans." <ul style="list-style-type: none"> The CEHD is responsible for reviewing projects, plans and programs of regional significance for consistency and conformity with applicable regional plans? Is this the responsibility of the TCWG?
190	Clarification	p. 204; column 1	Add criteria pollutants
191	Clarification	p. 204; column 2	Add EEC
192	Clarification	p. 206; column 2	"GIS – Geographic Information System – Mapping software that links information about where things are with information about what things are like. GIS allows users to examine relationships between features. <u>These include those</u> distributed unevenly over space, seeking patterns that may not be apparent without using advanced techniques of query, selection, analysis and display."
193	Clarification	p. 206; column 2	"Greenfield – Also known as "raw land," land that is privately owned, lacks urban services, has not been previously developed, and is located at the fringe of existing urban areas." <ul style="list-style-type: none"> "and is located at the fringe" or should it be "<u>or and</u> is located at the fringe"? Add where the definition comes from. Could this be publicly owned?
194	Clarification	p. 207; column 1	"GRRRA – Green Region Resource Areas – Derived from SB 375 statute and Connect SoCal 2020 strategies, GRRAs highlight where future growth is not encouraged <u>by SCAG</u> due to presence of open space, habitats, farmland, and/or sensitivity to natural hazards and a changing climate."
195	Clarification	p. 207; column 1	"Habitat Connectivity – The <u>extent</u> degree to which the landscape facilitates animal movement and other ecological flows." <ul style="list-style-type: none"> Add where the definition comes from.
196	Clarification	p. 207; column 2	"Household – A household <u>is a housing unit that is occupied by people and consists of all the people who occupy the a-housing unit.</u> A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit, such as partners or roomers, is also counted as a household."
197	Clarification	p. 208; column 1	"IGR – Intergovernmental Review Process – The review of documents by several governmental agencies to <u>consider</u> ensure consistency of regionally significant local plans, projects and programs with SCAG's adopted regional plans."
198	Clarification	p. 209; column 1	LAFCo LAFCo – Local Agency Formation Commission – Regional service planning agencies of the State of California that exercise regulatory and planning powers. LAFCo LAFCo s regulatory powers are outlined in California Government Code Sections 56375 and 56133.



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
199	Clarification	p. 209; column 1	"Livable Communities (<u>LC</u>) – Any..."
200	Clarification	p. 209; column 2	"Livable Corridors (<u>LC</u>) – Livable..."
201	Clarification	p. 209; column 2	"MAP-21 – Moving Ahead for Progress in the 21st Century – Signed into law by President Obama on July 6, 2012. Funding surface transportation programs at over \$105 billion for fiscal years <u>ending in</u> (FY) 2013 and 2014, MAP-21 was the first long-term highway authorization enacted since 2005."
202	Correction	p. 210; column 1	"Measure A – Revenues generated from Riverside County's local half- percentent sales tax. Measure D – Revenues generated from Imperial County's local half- percentent sales tax. Measure I – Revenues generated from San Bernardino County's local half- percentent sales tax. Measure M – Revenues generated from Orange County's local half- percentent sales tax. Also refers to Los Angeles County's local, half- percentent sales tax which was authorized in 2018. Measure R – Revenues generated from Los Angeles County's local half- percentent sales tax."
203	Clarification	p. 211; column 1	"Multifamily Residential – <u>For the purposes of the RTP/SCS, the category of "multi-family" residential units include townhomes, which are defined by the State of California Department of Finance and the U.S. Census Bureau as single-family homes. The category Connect SoCal refers to as 'multi-family' units are attached residences, including apartments, condominiums and townhouses. Multifamily residences are usually served by all utilities, are on paved streets, and are provided with or have access to all urban facilities such as schools, parks, and police and fire stations. Senior citizen apartment buildings are included in these classes. Also included are off-campus university-owned housing and off-campus fraternity/sorority houses.</u> " <ul style="list-style-type: none"> • Townhomes are single-family homes as defined by the State of California DOF and the U.S. Census Bureau.
204	Clarification	p. 211; column 1	"Natural Lands – Biologically diverse landscapes, such as forested and mountainous areas, shrub lands, deserts and other ecosystems, that contain habitat that supports wildlife and vegetation." <ul style="list-style-type: none"> • Add where the definition comes from.
205	Clarification	p. 211; column 2	"NIMBY – Not in My Backyard – The phenomenon where people oppose the location of a development perceived as undesirable (e.g., <u>housing</u> , landfill, freeway expansion) in their own neighborhood, <u>and often</u> but raise no objections of similar developments elsewhere."
206	Clarification	p. 213; column 1	"PEC – Priority Equity Communities – (Formerly Environmental Justice Areas, Disadvantaged Communities and Communities of Concern) Census tracts in the SCAG region with a greater concentration of populations that have been historically marginalized and are susceptible to inequitable outcomes based on several socioeconomic factors. *For more information, see the Equity Analysis Technical Report." <ul style="list-style-type: none"> • Define historically marginalized • Define socioeconomic factors



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none"> List source of the definition
207	Clarification	p. 214; column 1	“Proposition 1A – Passed by <u>California</u> voters in 2006, Proposition 1A...”
208	Correction	p. 214; column 2	<p>“Proposition A – Revenues generated from Los Angeles County’s local half-percent sales tax. Los Angeles County has three permanent local sales taxes (Propositions A and C, and Measure M) and one temporary local sales tax (Measure R).</p> <p>Proposition C – Revenues generated from Los Angeles County’s local half-percent sales tax. Los Angeles County has three permanent local sales taxes (Propositions A and C, and Measure M) and one temporary local sales tax (Measure R).”</p>
209	Clarification	p. 218; column 2	<p>“Small-Lot Development – A practice that allows for the subdivision of lots located within existing multifamily and commercial zones to develop fee-simple housing. Typically, small lot developments are not required to be part of a homeowner’s association, thus reducing the cost for home buyers.”</p> <ul style="list-style-type: none"> What is “fee-simple housing”?
210	Clarification	p. 219; column 1	<p>“Sustainable Development – Sustainable development <i>can support the region to thrive with essential</i> resources that maintain quality of life and a growing economy in the present, such as water, energy and food supply, while also enabling future generations to thrive amidst both forecasted and unforeseen challenges.”</p> <ul style="list-style-type: none"> Reword beginning of sentence (italics) to provide clarity; are the “essential resources” water, energy, food supply?
211	Clarification	p. 219; column 2	“TC – Transportation Committee – <u>SCAG Policy</u> Committee used to study problems, programs and other matters that pertain to the regional issues of mobility, air quality, transportation control measures and communications.”
212	Clarification	p. 220; column 2	“Transportation Equity Zones (<u>TEZs</u>) – Communities across the SCAG region most impacted by transportation-related inequities”
213	General comment	p. 221	Congestion pricing discussion should include Toll roads and express/HOT lane networks that charge users a fee for travel, but typically offer less congested traffic lanes than nearby freeways and roadways. Reduced congestion provides improved and more efficient mobility with fewer air pollutants and GHG emissions caused by congestion.
214	Clarification	p. 221; column 1	<p>“Universal Basic Mobility (<u>UBM</u>) – Programs that provide qualified residents with subsidies for transit and other mobility services.</p> <p>Urban Areas (<u>UZA</u>) – Urban Areas in the SCAG region represent densely developed territory and encompass residential, commercial and other nonresidential urban land uses where population is concentrated over 2,500 people in a given locale.”</p>
215	Clarification	p. 222; column 1	“Vehicle Revenue Hours – The hours that a public transportation vehicle actually travels while in revenue service. Vehicle revenue hours include layover/recovery time, but exclude deadheading (<u>vehicles not in service and driving without passengers</u>), operator training, vehicle maintenance testing, and school bus and charter services.”



#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
216	Clarification	p. 227; column 2; last paragraph; last sentence	"Staff gathered input from residents primarily via a survey that provided contextual and educational information. <u>The outreach activities include:</u> "
217	Clarification	p. 227; column 2	"Public survey: 3,600+ responses" <ul style="list-style-type: none"> Please clarify if this is the number of respondents or number of questions answered by respondent providing answer. It is misleading if the answer is the latter and should be clarified.

Table 2. PEIR COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
1	General Comment	PEIR	General: For an EIR document, is it appropriate to use first-person references (e.g., "our expansive goods movement" or "our region"), or should an EIR, as an information document, exclude such first-person references and use "the SCAG region" or something similar?	SUB 1-28
2	General Comment	PEIR	GHG Emission Reduction Target: The Draft EIR makes reference throughout the document of the SCAG GHG emission reduction target being "19% below 2005 levels by 2035." Should these references identify that this is a per capita reduction target, to eliminate any potential misunderstanding of the 19% 2035 reduction target equaling the 2005 GHG emissions at the regional level, minus 15% of that regional total level?	SUB 1-29
3	General Comment	PEIR	Many of the source citations in the GHG Emissions chapter cite sources dated from 2007, 2016 and 2017. What is the protocol for the using up-to-date source references? Are these from prior documents and perhaps need to be updated? Or were they used because the analysis and source material were to relate to the Plan's 2019 Existing Conditions base year?	SUB 1-30
4	General Comment	PEIR	<u>GHG Emission Reduction Target</u> : The Draft EIR makes reference throughout the document of the SCAG GHG emission reduction target being "19% below 2005 levels by 2035." Should these references identify that this is a <u>per capita</u> reduction target, to eliminate any potential misunderstanding of the 19% 2035 reduction target equaling the 2005 GHG emissions at the regional level, minus 15% of that regional total level?	SUB 1-31
5	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.	SUB 1-32
6	General Comment	All pages; tables; figures	Black font on teal background is difficult to read in tables and figures	SUB 1-33
7	General Comment	All tables	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.	SUB 1-34
8		ES-4; bullet 3	"Orange County. Orange County covers an area of 799948 square miles. Anaheim is the city with the highest population level in the county, with approximately 347,000 people in 2019. Overall, the county had 3,191,000 residents that year."	SUB 1-35



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			<ul style="list-style-type: none"> County of Orange Surveyor/Public Works' official information is that OC covers ~799 square miles. This does not include city boundaries that extend approximately 3 miles off the coastline, which is included by the U.S. Census Bureau from which the 948 estimate is cited. Update land totals for Ventura and Los Angeles Counties to remove the ocean census tract area if U.S. Census Bureau geographic information was used 	
9	Transportation Network	ES-5	<p>The inventory of the bus routes mileage on page ES-5 warrants some clarification.</p> <p>Clarify whether the total miles of bus routes includes or excludes the separately listed bullet of express bus lanes miles. Specifically, is the 2,302 miles of express bus lanes a subset of the 33,485 miles of total bus routes listed, or a separate and additive inventory.</p>	SUB 1-36
10	Land Uses	ES-5	<p>Incorrect, interchangeable use of "households" versus "housing units". <u>Please see revised wording below.</u></p> <p>"The SCAG region is comprised of complex patterns of land uses including residential, commercial/office, industrial, institutional, agricultural, and open space land uses. The region has incredible diversity in its built environment and land use patterns (see Map ES-4, Existing Land Use, below). As of 2019, the SCAG region has a total of approximately 6.5 <u>6.2</u> million <u>housing units</u> households in its housing stock, with over half of the <u>housing units</u> households having been built before 1980. While 54 percent are single-family homes, 46 percent are <u>attached multifamily</u> generically referred to as multi-family units for the purposes of Connect SoCal—such as condominiums, townhouses, and apartments. <u>There are about 6.2 million households in the SCAG region (occupied housing units).</u> ..."</p>	SUB 1-37
11	Clarification	ES-6; paragraph 2; sentence 1	<p>"The Plan was also developed to achieve <u>state</u> targets for greenhouse gas (GHG) emissions reductions..."</p>	SUB 1-38
12	Clarification	ES-7; footnote; sentence 4	<p>"SCAG used its best efforts to incorporate the RHNA, but the data is inherently incomplete because only 12 of 197 jurisdictions had certified housing elements <u>in May 2022</u>, and some local jurisdictions may not be required to complete rezoning associated with housing elements until October 2024."</p> <ul style="list-style-type: none"> Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic. 	SUB 1-39
13	Financial Plan	ES-11; 2-30	<p>EIR states that "Transit-related costs comprise the largest share of O&M costs for the region, totaling approximately \$250 billion."</p> <p>(1) Please refer the reader to the applicable table (Table 2-5, pp. 2-30 and 2-31).</p> <p>(2) Does "transit" include both bus and rail transit? Also, does transit include "passenger rail"?</p>	SUB 1-40



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
			(3) Table 2-5, page 2-31, identifies Transit O&M as \$244.5 billion, in contrast to the \$250 billion cited on page ES-11. Please review and correct.
14	Alternative 1: No Project Transportation Network	ES-12 4-9	Page ES-12 of the EIR states that the Alternative 1: the No Project Alternative includes the first two years of transportation projects in the previously-conforming RTP or FTIP. Other sections of the EIR (e.g., page 4-9) reference that Alternative 1 includes the first year of programmed transportation projects. Review and confirm and make consistent in the EIR document: is it one or two years of transportation programming that is included in Alternative 1?
15	Correction	ES-13; paragraph 2; sentence 1	“As discussed in Chapter 4, Alternatives, the summary comparison for the No Project Alternative, Intensified Land Use Alternative, and the Plan is presented in Error! Reference source not found. 7, Comparison of Significant Adverse Environmental Impacts for Connect” <ul style="list-style-type: none"> • Insert missing information
16	Clarification	ES-15; paragraph 2	Provide a clear statement here to the following effect: All mitigation measure recommendations to project sponsors and agencies are advisory. Lead agencies are responsible for identifying and addressing those measures they deem practical and feasible, or applicable to specific projects. This would remove the need to start every project level mitigation by stating, “Project-level mitigation measures can and should be considered by lead agencies as applicable and feasible.”
17	Mitigation Measures: Project level	ES-18 to ES-77	The project level mitigation measures use various terminology to allow the Lead Agency to determine if EIR mitigation measures are applicable and reasonable for a project. Phrases used in the EIR include: <ul style="list-style-type: none"> • "as applicable and feasible" • "to the maximum extent practicable" * "wherever practicable and feasible" * "wherever feasible" a) Make the reference consistent in phrasing across all project-level mitigation measures. b) Apply said phrasing to all the project-level mitigation measures.
18	Mitigation Measures: Project level	ES-18 to ES-77	Many of the mitigation measures seem to reference policies, procedures, best practices, and documents from other agencies (e.g., Caltrans, air districts, etc.). <p>a) When referencing other agency documents (such as PMM-AQ-1(i) that references Caltrans' Standard Specifications 10-Dust Control, 17-Watering and 18: Dust Palliative), is it better to just reference that a project should consider applicable Caltrans and other agency specifications, rather than detailing the specific reference documents, which may be amended over time and the references could have the potential to be outdated over the four years of the RTP/SCS Plan?</p> <p>b) Many of the mitigation measures contain an extensive inventory of "best practices" from other agencies. Where does one establish a line as to what constitutes a "best practice" versus a "mitigation measure"? Would many of these other agency "best practices" that are inventoried in the mitigation measures, be duplicative of comments that are received by the Lead Agency from said agencies, as part of an environmental review process of a specific project, or in conjunction with applying for a permit? What is the</p>

SUB 1-41

SUB 1-42

SUB 1-43

SUB 1-44

SUB 1-45



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
			appropriate level of detail of other agency requirements that should be listed in the EIR, especially as mitigation measures?
19	Mitigation Measures: PMM-AES-1	ES-18	<p>To address aesthetic impacts, MM PMM-AES-1 (c) includes language that the Lead Agency "Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas."</p> <p>How would this emphasis on maintaining consistency with the surrounding area's dominant landscaping, conflict with efforts to support drought tolerant landscaping? There are other efforts already being conducted by local jurisdictions and county transportation commissions, which fund the removal of non-drought tolerant landscaping and replace it with drought tolerant landscaping as well as water conserving irrigation systems. How should the mitigation measure be amended, to best address potentially conflicting objectives between aesthetics and drought-tolerance?</p>
20	Mitigation Measures: PMM-AES-2	ES-19	<p>To address existing visual character and public views, MM PMM-AES-2 references Lead Agency measures such as developing design guidelines for projects, to make elements of proposed buildings and facilities visually compatible or to minimize the visibility of changes.</p> <p>While one recognizes that the proposed mitigation measure does emphasize that the application of the Mitigation Measure is <i>as applicable and feasible</i> by the Lead Agency, there lacks a sensitivity or recognition that for some residential projects, the looks, mass, height and general character of ministerial and by-right projects will not be negotiable between a Lead Agency and a project developer.</p>
21	Mitigation Measures: SMM-AG-3	ES-21	<p>To address farmland preservation, MM SMM-AG-3 references SCAG's development of the Greenprint web-based tool.</p> <p>a) The mitigation measure should identify that the Greenprint Tool is an <u>elective</u> tool for local jurisdictions and county transportation commissions.</p> <p>b) As referenced in the mitigation measure, is "scenario visualization" a component of the Greenprint Tool, with the current recommended directive that the Tool start small?</p> <p>c) Propose that the mitigation measure language be revised as follows: "... to support local jurisdictions and transportation agencies make better <u>informed</u> land use and transportation infrastructure decisions....".</p>
22	Clarification	Table ES-3; ES-24	<p>"PMM-AQ-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, <u>where applicable and feasible</u>. Such measures may include the following or other comparable measures identified by the lead agency:"</p>
23	Mitigation Measures: PMM-AQ-1: Enhanced Filtration Units	ES-26 ES-27	<p>Mitigation Measure PMM-AQ-1(z) includes an extensive inventory of enhanced air filters monitoring, inspection and maintenance program, for projects located with 500 feet of freeways and other sources. The last element of the program requires the Lead Agency to "Develop a process for evaluating the effectiveness of the enhanced filtration units."</p>

SUB 1-46

SUB 1-47

SUB 1-48

SUB 1-49

SUB 1-50



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
			This last element seems to bring into question whether the enhanced air filters are effective, while nonetheless recommending a series of actions relating to their installation. Please clarify and appropriately re-word.
24	Mitigation Measures: PMM-AQ-1: Title 24 Building Code	ES-28	Mitigation Measure PMM-AQ-1(cc) states that a Lead Agency "Promote energy efficiency and exceed Title-24 Building Code Envelope Energy Efficiency Standards (California Building Standards Code). Clarify the appropriateness of a mitigation measure that seeks a Lead Agency to ask for exceeding state code requirements.
25	Mitigation Measures: PMM-AQ-1: Construction Period	ES-29	Mitigation Measure PMM-AQ-1(ee) states that a Lead Agency should consider whether to "Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time." Is this a recommended practice that is currently in place? Please clarify how the construction period would be lengthened? Is this to extend the construction period (e.g. hours) during the day, or how many the number of days of the week when construction could occur, or to ask a developer to take a longer amount of time to develop the project? Is this a realistic ask?
26	Mitigation Measures: PMM-AQ-1: Construction Period	ES-29	Mitigation Measure PMM-AQ-1(ee) states that a Lead Agency should consider whether to "Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time." Is this a recommended practice that is currently in place? Please clarify how the construction period would be lengthened? Is this to extend the construction period (e.g. hours) during the day, or how many days of the week when construction could occur, or to ask a developer to take a longer amount of time to develop the project? Is this a realistic ask?
27	Clarification	Table ES-3; ES-30	"PMM-AQ-2 For pProjects subject to California Environmental Quality Act (CEQA) review (i.e., non-exempt projects) and located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and within one-quarter mile (1,320 feet) of a sensitive land use, <u>project leads, as applicable and feasible, should</u> shall prepare an air quality analysis that evaluates potential localized project air quality impacts in conformance with SCAQMD methodology for assessing localized significance thresholds (LST) air quality impacts. If air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the project <u>should</u> shall incorporate feasible mitigation measures to reduce air pollutant emissions."
28	Clarification	Table ES-3; ES-30-31	"PMM-BIO-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the 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, and species that meet the definition of "rare" as defined in CEQA Guidelines Section 15380(b)(2), <u>where applicable and feasible.</u> "
29	Clarification	Table ES-3; ES-32	"PMM-BIO-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and

SUB 1-51

SUB 1-52

SUB 1-53

SUB 1-54

SUB 1-55

SUB 1-56



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the lead agency."	
30	Mitigation Measures: PMM-BIO-3: In-lieu fees vs in kind services	ES-34	Mitigation Measure PMM-BIO-3() states that wetlands compensatory mitigation can include "Contribution of in-kind in-lieu fees." Is this an error and perhaps should read "Contribution of in-kind services or in-lieu fees"? In-kind typically refers to the payment of goods or services, as opposed to monies.	SUB 1-57
31	Clarification	Table ES-3; ES-34	"PMM-BIO-3 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible</u> ."	SUB 1-58
32	Clarification	Table ES-3; ES-35	"PMM-BIO-4 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible</u> ."	SUB 1-59
33	Mitigation Measures: PMM-BIO-4: Open space/nursery site areas	ES-37	Mitigation Measure PMM-BIO-4(p) identifies that where an RTP/SCS or other regionally significant project has the "potential to impact other open space or nursery site areas ," that compensatory coverage should be sought. The mitigation measure should clarify what is "other open space". Also, the reference to "nursery site areas" should be expanded to reference what type of nursery site area is governed by this mitigation measure. All plant nurseries, including commercial nurseries? And how would this address wildlife movement, which is the emphasis of the mitigation measure?	SUB 1-60
34	Mitigation Measures: PMM-BIO-4: Corridor Redundancy	ES-38	Mitigation Measure PMM-BIO-4(v) identifies that one comparable measure to address wildlife movement impacts, is to "Create corridor redundancy to help retain functional connectivity and resilience." The mitigation measure should include clarification on exactly what type of corridor redundancy is being recommended, to avoid confusion between a transportation corridor versus a wildlife or other corridor that the mitigation measure is addressing.	SUB 1-61
35	Clarification	Table ES-3; ES-38	"PMM-BIO-5 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible</u> ."	SUB 1-62
36	Mitigation Measures: PMM-BIO-4: Tree Removal Timing	ES-39	Mitigation Measure PMM-BIO-5(h) identifies that debris to be removed as a result of tree removal work should be done within two weeks of debris creation. Recommend that the timing also include the phrase "or as determined by the local jurisdiction", to allow for compliance with any local agency requirements or timing needs.	SUB 1-63



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
37	Clarification	Table ES-3; ES-40	"PMM-BIO-6 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible.</u> "
38	Clarification	Table ES-3; ES-40	"PMM-CUL-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible.</u> "
39	Clarification	Table ES-3; ES-43	"PMM-CUL-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible.</u> "
40	Clarification	Table ES-3; ES-44	"PMM-GEO-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider, <u>where applicable and feasible</u> , mitigation measures to minimize the potential for adverse effects associated with surface fault rupture, seismic ground shaking, seismic-related ground failure, liquefaction, and landslides for projects located on sites with unusual geologic conditions, the following measures <u>should shall</u> be considered:"
41	Clarification	Table ES-3; ES-45	"PMM-GEO-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to geological impacts, <u>where applicable and feasible.</u> "
42	Clarification	Table ES-3; ES-46	"PMM-GEO-3 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible.</u> "
43	Clarification	Table ES-3; ES-47	"PMM-GHG-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible.</u> "
44	Mitigation Measures: PMM-GHG-1: EV	ES-48 ES-49	To promote GHG reduction, Mitigation Measure PMM-GHG-1(a)(ix), 1(j)iv and (l) promote electric vehicle infrastructure. Is the draft EIR solely promoting electric vehicle infrastructure, or should these references also include other alternative-fueled infrastructure, such as hydrogen? Also please see other minor comments on MM PMM-GHG-1 in the attached scanned document.
45	Mitigation Measures: SMM-LU-1: Siting New Facilities	ES-60	Mitigation Measure SMM-LU-1 requires SCAG to work with agencies and jurisdictions "when siting new facilities in residential areas...". Does this reference apply to new facilities related to transportation, such as new roads and freeways? If so, please include this clarifier, to prevent any misunderstanding on the types of new facilities the mitigation is supposed to address.
46	Clarification	Table ES-3; ES-60	"PMM-HYD-4 ...Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. In areas affected by coastal flooding, new projects should be designed for

SUB 1-64

SUB 1-65

SUB 1-66

SUB 1-67



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			resilience <u>against</u> with 3.5 feet of sea-level rise, as per California Ocean Protection Council’s strategic guidance.”	
47	Clarification	Table ES-3; ES-64	“PMM-NOI-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, <u>where applicable and feasible.</u> ”	SUB 1-68
48	Mitigation Measures: PMM-POP-1	ES-66	Impact PPO-2 identifies that proposed Mitigation Measure PMM-POP-1 is to address the displacement of existing people and housing. PMM-POP-1(a) also includes a reference to the impacts of businesses on transportation route alignments. Please clarify if this mitigation measure is to apply to both existing homes and businesses, and if so, make the project impact and mitigation measure consistent in applicability.	SUB 1-69
49	Clarification	Table ES-3; ES-70	“PMM-TRA-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts, <u>where applicable and feasible.</u> Such measures may include the following or other comparable measures identified by the lead agency: <input checked="" type="checkbox"/> For future land use development projects, lead agencies should <u>shall</u> encourage the incorporation of transit, bicycle, pedestrian, and micro-mobility facilities, features, and services”	SUB 1-70
50	Mitigation Measures: PMM-TRA-2 FHWA Document Reference	ES-71	Mitigation Measure PMM-TRA-2 addresses the consideration of TDM strategies in land use and transportation projects and plans. Said mitigation measure references, as guidance, an FHWA 2012 desk reference. Is 2012 the most current iteration of the document, and if so, has the document been reviewed to determine if it is up-to-date and relevant, with current technologies, strategies and trends?	SUB 1-71
51	Clarification	Table ES-3; ES-71	“PMM-TRA-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts, <u>where applicable and feasible.</u> ”	
52	Clarification	Table ES-3; ES-71	“PMM-TRA-3 A lead agency for a project should, where applicable and feasible, prepare <u>Prepare</u> a sight distance analysis as needed for locations where sight lines could be impeded. The sight distance analysis to be prepared according to the jurisdiction’s applicable Municipal Code requirements and the Caltrans Highway Design Manual (HCM) standards and guidelines, and should recommend safety improvements as appropriate such as limited use areas (e.g., low-height landscaping), and on-street parking restrictions (e.g., red curb), and any turning restrictions (e.g., right-in/right-out).”	SUB 1-72
53	Clarification	Table ES-3; ES-72	“PMM-TCR-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible.</u> ”	
54	Clarification	Table ES-3; ES-73	“PMM-UTIL-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the 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	SUB 1-73



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			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.”	
55	Mitigation Measures: PMM-UTIL-3	ES-75	Mitigation Measure PMM-UTIL-3 focuses on the reduction of solid waste. There are several references about developing opportunities to divert food waste from landfills. Perhaps there should be a reference to SB 1383, which is already law, and focus the emphasis on strengthening versus developing opportunities to divert food waste? <ul style="list-style-type: none"> • Think about removing J or rewording ordinance encouragement 	SUB 1-74
56	Clarification	Map ES-1	<ul style="list-style-type: none"> • Add page number • Add label for Orange County 	SUB 1-75
57	Clarification	Map ES-2	<ul style="list-style-type: none"> • Add page number • Add label for Orange County • Change source to SCAG • Map ES-2 illustrates 16 subregions in the Legend, but page ES-4 states there are 15 subregions in SCAG. Please review and correct inconsistency. • The legend color used for Orange County and SANBAG is almost identical. Is there any opportunity to change the color choice, especially since Orange County and San Bernardino County share a border? 	SUB 1-76
58	Regional Location	ES-4; Map ES-2	EIR states that "the SCAG region consists of 15 subregional entities...". However, the referenced Map ES-2 illustrates 16 subregions. Please review and make consistent.	SUB 1-77
59	Clarification	Map ES-3	<ul style="list-style-type: none"> • Add page number • Reduce thickness of city boundary lines 	SUB 1-78
60	Clarification	Map ES-4	<ul style="list-style-type: none"> • Add page number • Add year to title • Add note specifying land use categories were standardized by SCAG. 	SUB 1-79
61	Clarification	p. ES-92; Map ES-5	<ul style="list-style-type: none"> • Add page number • Add language to map and/or map page <p>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation</p>	SUB 1-80



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."	
62	Clarification	Map ES-6	<ul style="list-style-type: none"> Add page number Add year to title Change legend's "Freeway" to "Freeway/Toll Road" 	SUB 1-81
63	Clarification	Map ES-7	<ul style="list-style-type: none"> Add page number 	SUB 1-82
64	Clarification	p. 1-2; paragraph 3; sentence 6	"...SCAG developed the LDX process to engage local jurisdictions <u>partners</u> and get information needed to fulfill state planning requirements."	SUB 1-83
65	Correction	p. 1-8; paragraph 3; sentence 2	<p>"... Drafting an EIR [...] necessarily involves some degree of forecasting (CEQA Guidelines Section 15144)."</p> <ul style="list-style-type: none"> Insert the missing reference information 	SUB 1-84
66	Clarification	p. 1-14; paragraph 2; sentence 1	"In addition, the 2024 PEIR identifies project-level mitigation measures for lead agencies to consider which they "can and should" <u>consider for adoption</u> adopt , as applicable and feasible, in subsequent project-specific design, CEQA review, and decision-making processes."	SUB 1-85
67	Clarification	p. 1-15; paragraph 2; sentence 5	"The notices <u>notice</u> are published in English, Spanish, Korean, Chinese, and Vietnamese languages. The Draft Connect SoCal 2024 <u>documents</u> are posted on the SCAG website and virtually distributed to libraries throughout the region, and physically distributed to libraries upon request."	SUB 1-86
68	Clarification	p. 1-18; Table 1-3	<ul style="list-style-type: none"> Add horizontal lines between rows to make information easier to read 	SUB 1-87
69	Clarification	p. 2-6; paragraph 4; last sentence	<p>"Additionally, some local jurisdictions may not be required to complete rezonings associated with housing element updates until October 2024, rendering data on newly available sites inherently incomplete (or unavailable) for the purposes of Connect SoCal 2024."</p> <ul style="list-style-type: none"> Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic. 	SUB 1-88
70	Clarification	p. 2-7; paragraph 3; last sentence	"As noted above, Connect SoCal 2024 utilized the LDX process to solicit land use and growth input directly from SCAG's local jurisdictions, and the Plan is the first RTP/SCS prepared by SCAG that did not modify <u>the requested</u> local data inputs <u>of housing and employment</u> ."	SUB 1-89
71	Correction	p. 2-8; bullet 3	<p>"Orange County. Orange County covers an area of 7999 <u>799</u> square miles. Anaheim is the city with the highest population level in the county, with approximately 347,000 people in 2019. Overall, the county had 3,191,000 residents that year."</p> <ul style="list-style-type: none"> County of Orange Surveyor/Public Works' official information is that OC covers ~799 square miles from the coastline inland. This does not include city boundaries that extend approximately 3 miles off the coastline, which is included by the U.S. Census Bureau from which the 948 estimate is cited. Density calculations using 948 should be redone using the 799 square miles that does not include the ocean area. 	SUB 1-90



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			<ul style="list-style-type: none"> Update land totals for Ventura and Los Angeles Counties to remove the ocean census tract area if U.S. Census Bureau geographic information was used 	
72	Clarification	p. 2-8; Section 2.4.2; bullet 1	<p>“40 miles of heavy and light rail”</p> <ul style="list-style-type: none"> There are only 40 miles of heavy & light rail in the region? 	SUB 1-91
73	Clarification	p. 2-9; paragraph 1; sentence 4	<p>“While 64 percent are single-family homes, 36 percent are multifamily homes such as condominiums, townhouses, and apartments.”</p> <ul style="list-style-type: none"> Townhomes are single-family attached homes as defined by the State of California DOF and the U.S. Census Bureau. Perhaps add language that says “For the purposes of the RTP/SCS, the category of “multi-family” is a short-hand reference for housing units other than single-family detached housing units. These include attached housing units, such as townhomes, which are single-family attached units; condominiums; and apartments.” 	SUB 1-92
74	Clarification	p. 2-9; paragraph 2; sentence 4-5	<p>“... Much of the open space in the region has been left in its natural state, however many non-native species have transformed what was once native habitat. As of 2018, about half of California has been mapped and classified according to this standard; much of southern California has not yet been classified (CDFW 2023).”</p> <ul style="list-style-type: none"> Clarify “this standard” 	SUB 1-93
75	Clarification	p. 2-9; paragraph 3;	<p>“More than 20 million acres of open space within the SCAG region is currently conserved protected under a Habitat Conservation Plan or Natural Community Conservation Plan or will be protected by a future conservation plan that is currently in its planning stages. Data from CDFW and USFWS show 31 plans with durations of 16–80 years providing conservation efforts nearly 3 million acres in the SCAG region. These plans identify and provide for the regional protection of plants, animals and their habitats, while allowing compatible and appropriate economic activity.”</p> <ul style="list-style-type: none"> Please cite sources of data and clarify numbers and language; is this additive or exclusive? 	SUB 1-94
76	Clarification	p. 2-12; footnote; sentence 4	<p>“SCAG used its best efforts to incorporate the RHNA, but the data is inherently incomplete because only 12 of 197 jurisdictions had certified housing elements, and some local jurisdictions may not be required to complete rezoning associated with housing elements until October 2024.”</p> <ul style="list-style-type: none"> Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic. 	SUB 1-95
77	Clarification	p. 2-13; paragraph 2; sentence 1	<p>“SCAG has the opportunity to analyze and address the inequities that the <u>public</u>, government, and planning profession have created by systemically driving and perpetuating societal differences along racial lines.”</p> <ul style="list-style-type: none"> Planners and government are not the only parties responsible 	SUB 1-96
78	Clarification	p. 2-13; paragraph 3; last sentence	<p>“This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces and conserve the region’s resource areas.”</p> <ul style="list-style-type: none"> Clarify “if fully realized” 	SUB 1-97



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
79	Clarification	p. 2-13; bullet 1; sentence 2	<p>"Transit Priority Areas (TPAs). ...Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands."</p> <ul style="list-style-type: none"> Clarify how and explain the assets TPAs can reinforce 	SUB 1-98
80	Clarification	Table 2-2;	<ul style="list-style-type: none"> All goals should have same language as in Connect SoCal main report. 	
81	Clarification	Table 2-2; p. 2-18	<p>"6. Support implementation of complete streets improvements in Priority Equity Communities*, and particularly with respect to Transportation Equity Zones*, to enhance mobility, safety, and access to opportunities."</p> <ul style="list-style-type: none"> Missing footnote for * 	
82	Correction	Table 2-2; p. 2-19	<p>"15. Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the existing transportation system instead of adding roadway capacity, <u>where possible</u>.</p> <p>16. Prioritize transportation investments that increase travel time reliability, including build-out of the regional express lanes network."</p> <ul style="list-style-type: none"> Language is not consistent with Connect SoCal 	
83	Clarification	Table 2-2; p. 2-19	<p>"22. Reduce<u>Eliminate</u> transportation-related fatalities and serious injuries on the regional multimodal transportation system."</p>	SUB 1-99
84	Addition	Table 2-2; p. 2-20	<p>Add new 42. <u>Support a mix of housing types throughout the region; including single-family detached development, which can increase equity-building opportunities for all income levels.</u></p>	
85	Correction	Table 2-2; p. 2-22	<p>"73. Advance comprehensive systems-level planning of corridor/supply chain operational strategies <u>that is</u>, integrated with road and rail infrastructure, and inland port concepts."</p> <ul style="list-style-type: none"> Reword to match Connect SoCal p. 120 	
86	Correction	Table 2-2; p. 2-22	<p>"79. Promote an atmosphere <u>that</u> which allows for healthy competition and innovative solutions which are speed driven, while remaining technologically neutral"</p> <ul style="list-style-type: none"> Reword to match Connect SoCal p. 120 	
87	Clarification	Table 2-2; p. 2-23	<p>"89. Encourage the reduced use of cars by visitors to the region by working with state, county, and city agencies to highlight and increase access to <u>safe</u> alternative options, including transit, passenger rail, and active transportation."</p>	
88	Clarification	Map 2-1	<ul style="list-style-type: none"> Add page number Add label for Orange County Change source to SCAG 	SUB 1-100
89	Clarification	Map 2-2	<ul style="list-style-type: none"> Add page number Add label for Orange County Change source to SCAG 	SUB 1-101
90	Clarification	Map 2-3	<ul style="list-style-type: none"> Add page number Bus routes and freeways are hard to differentiate 	SUB 1-102
91	Clarification	Map 2-5	<ul style="list-style-type: none"> Add page number Add year to title 	SUB 1-103
92	Clarification	Map 2-6	<ul style="list-style-type: none"> Add page number 	SUB 1-104



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			<ul style="list-style-type: none"> Why only major airports? 	
93	Clarification	Map 2-7	<ul style="list-style-type: none"> Add page number Add year to title Add note specifying land use categories were standardized by SCAG. 	SUB 1-105
94	Clarification	p. 2-42 Map 2-8	<ul style="list-style-type: none"> Add page number Add year to title Add language to map and/or map page <p>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”</p>	SUB 1-106
95	Clarification	Map 2-9	<ul style="list-style-type: none"> Add page number Add year to title 	
96	Clarification	Map 2-10	<ul style="list-style-type: none"> Add page number Add year to title 	
97	Clarification	Map 2-11	<ul style="list-style-type: none"> Add page number Add year to title 	SUB 1-107
98	Clarification	Map 2-12	<ul style="list-style-type: none"> Add page number Add city boundaries to legend 	
99	Clarification	p. 2-47	<p>“<u>U.S. Census Bureau American Community Survey 2017 1-Year Estimates; American FactFinder. 2017. 2017 Population Estimates.</u> https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml. Accessed July 29, 2019.”</p>	SUB 1-108
100	Correction	p. 3-5; paragraph 5; sentence 3	<p>“<u>The regional growth forecast process incorporates extensive input and data including the most up-to-date local land use information, policy responses, demographic...</u>”</p>	SUB 1-109
101	Clarification	p. 3-5; footnote	<p>“SCAG’s regional growth forecasting process emphasized the participation of local jurisdictions and other stakeholders. The Local Data Exchange (LDX) process was used to give local jurisdiction’s <u>jurisdictions</u> the opportunity to provide input related to land use and the future growth of employment and households to ensure that the most updated information from local jurisdictions was gathered to link and align local planning with a regional plan that can meet federal and state requirements and reflect a regional vision. Therefore, LDX was a key component of allocation of growth across jurisdictions in the SCAG region with 67% of jurisdictions providing information as part of the LDX process. <u>The deadline for local jurisdiction in the LDX process was December 2022.</u>”</p>	SUB 1-110



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			<ul style="list-style-type: none"> Who are the "other stakeholders"? Did the public or other groups have input into the growth forecast? Does this refer to the panel of experts? 	
102	Existing Conditions	3.8-7	<p>The draft EIR states "The Safeguarding California Plan was updated in 2018 to present new policy recommendations and provide a road map of all the actions and next steps..."</p> <p>Is the Safeguarding California Plan supposed to be updated every three years? Has the State developed an updated list of policy recommendations and implementation actions that should also be referenced in this section? Or is the approach to keep the discussion to the 2018 California Plan, because of the emphasis on Existing Conditions?</p>	SUB 1-111
103	Existing Conditions: SCAG Region	3.8-10 3.8-57 3.8-59	<p>In the second paragraph to this section, please re-review and re-check the Table numbers, table titles, and percentage (for Imperial County assigned to transportation GHG emissions), and correct, as appropriate. For example, the title referenced in this paragraph for Table 3.8-7 does not match the title actually assigned to Table 3.8-7 on page 3.8-57. Also, there are references to county-level GHG data that are not in Table 3.8-7 (is it supposed to be Table 3.8-10 on page 3.8-59?). Further, there is a reference to Imperial County generating, in 2019, 1.7% of the region's total transportation GHG emissions, which is not illustrated in any applicable county table of data.</p>	SUB 1-112
104	Regulatory Framework: Orange County	3.8-42	<p>The section on Orange County's regulatory framework for GHG reductions cites a 2023 Orange County Register source on Orange County moving "forward with developing a county climate action plan to address ways the county could help slow climate change and mitigate the local effect."</p> <p>Please confirm and identify the agency/agencies in charge of developing an Orange County climate action plan.</p>	SUB 1-113
105	Table 3.8-6: Jurisdictions Addressing Climate Change	3.8-44	<p>Having two distinct listings of jurisdictions from distinct counties on the same page, with said listings extending into multiple pages, was initially confusing in Table 3.8-6.</p>	SUB 1-114
106	Transportation Emissions: OGV	3.8-58 3.8-59	<p>Please include the acronym OGV in the EIR Glossary.</p>	SUB 1-115
107	SB 743 and VMT Guidance	3.8-65	<p>This section of the draft EIR states "At the time of preparing this 2024 EIR it is unknown how CARB and the other state agencies, through statewide programs or in coordination with local and regional governments, would meet the identified higher VMT reductions."</p> <p>Please include a short summary of what the higher SB 743 VMT targets are, to prevent the reader from having to research and understand the degree of context.</p>	SUB 1-116
108	Mitigation Measures: GHG	3.8-66 to 3.8-69	<p>Please see comments, proposed revisions and edits from the draft EIR Executive Summary, Table ES-3: Summary of Project Impacts, Mitigation</p>	SUB 1-117



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			Measures and Residual Impacts, relating to the GHG mitigation measures (pages ES-47 through ES-50), and carry over to Chapter 3.	
109	3.11.1: Environmental Setting Definitions: Recreation	3.11-2	Definition of "recreation". Please identify if recreation areas include both public and private-owned parks and open space areas. As an example, private parks and open space can satisfy local parks requirements for residential developments, with ownership of said private parks and open space by homeowner associations.	SUB 1-118
110	3.11.1: Environmental Setting Definitions: Subregion	3.11-2 Map ES-2 ES-4	Definition of "subregion". Map ES-2 illustrates 16 subregions in the map Legend, but page ES-4 (of the Executive Summary) and page 3.11-2 of this chapter state there are 15 subregions in the SCAG region. Please review and correct inconsistency.	SUB 1-119
111	3.11.1: Environmental Setting Definitions: Vacant Land Existing Land Uses	3.11-3	Definition of "vacant land" is described in this chapter as land that "is generally referred to land with no buildings on it." Please clarify if the designation of vacant land includes land with no buildings on it, but with improvements such as surface parking lots. This issue has come up in local jurisdiction review of parcel level existing land uses and how to appropriately classify such land uses. Perhaps the inclusion of the term "undeveloped" or "no improvements", as are used in the narrative on vacant lands on page 3.11-3, would be of benefit.	SUB 1-120
112	Clarification	p. 3.11-5; paragraph 1	"The SCAG region is composed of six counties: Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The Plan's policies and strategies encourage improvement in the jobs-housing balance by focusing new housing and employment in Priority Development Areas (PDAs). A general discussion of the land use patterns is provided for each of the six SCAG counties below and is sourced from each County government's General Plan."	SUB 1-121
113	3.11.1: Environmental Setting Counties: Orange	3.11-5; paragraph 6	"Between 2000 and 2019, the total population of Orange County increased by 12.1 percent, which was slightly higher than the SCAG region increase of 14 percent. The <u>County of Orange's</u> General Plan assessed that Orange County would experience a steady but declining amount of land available for development." <ul style="list-style-type: none"> Please re-check the numbers. The percentages comparison and the conclusion do not match. 	SUB 1-122
114	Clarification	p. 3.11-6	"San Bernardino. Between 2000 and 2019, the total county population increased by 27.2 percent (U.S. Census Bureau 2002; SCAG 2021, 2023a); well above the SCAG <u>regional region</u> increase of 14 percent (SCAG 2021, 2023a). Much of the development in San Bernardino has occurred on unincorporated county land. The <u>County of San Bernardino's</u> General Plan..."	SUB 1-123
115	3.11.1: Environmental Setting Counties: Ventura	3.11-6	In the discussion of Ventura County, this chapter states "Between 2000 and 2019, Ventura County's population growth increase of 12.8 percent was slightly higher than the SCAG region increase of 14 percent." <ul style="list-style-type: none"> Please re-check the numbers. The percentages comparison and the conclusion do not match. 	SUB 1-124
116	Clarification	p. 3.11-8; paragraph 2; sentence 6	"City and county general plans must be consistent with each other. Local jurisdictions implement their general plans through zoning ordinances. Zoning ordinances provide a much greater level of detail including the	SUB 1-125



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			<p>general plan land use designations and such information as permitted uses, yard setbacks, and uses that would require a conditional use permit (Map 3.11-1, General Plan Land Use Designations, shows the general land use designations (consolidated for purposes of consistency and mapping) for the six SCAG member counties and 191 cities in the SCAG region)."</p> <ul style="list-style-type: none"> "City and county general plans must be consistent with each other." This statement is not accurate. Delete. 	
117	Clarification	p. 3.11-8; paragraph 3&4	<p>"The land use elements of the county and city general plans within the SCAG region generally classify lands into into 35 land use categories (Table 3.11-2, SCAG Region General Land Use Categories).</p> <p>According to <u>modeling results of the SPM data</u>, the Plan would add approximately 50,000 urbanized acres to the region by 2050 (SCAG 2023c)."</p>	SUB 1-126
118	3.11.1: Environmental Setting Existing Land Uses by County	3.11-8	<p>In the discussion of existing land uses by county, this chapter states "According to SPM data, the Plan would add approximately 50,000 urbanized acres to the region by 2050."</p> <p>To avoid any misinterpretation of the 50,000 acres comprising new acreage being added to the region, perhaps the verb "add" could be revised to explain that the Plan incorporates land use changes to existing acreage (i.e., through infill or redevelopment, in addition to greenfield development)?</p>	SUB 1-127
119	3.11.1: Environmental Setting Existing Land Uses by County Table 3.11-2	3.11-8; Table 3.11-2	<p>In the discussion of existing land uses by county, this chapter states "The 35 land uses noted in Table 3.11-2 are grouped into three Land Development Categories (LDCs) to describe the general conditions in a given area, including urban, compact and standard LDCs". In reviewing Table 3.11-2, there seems to be a mismatch between the narrative on page 3.11-8 and the presentation of information on Table 3.11-2. As an example, Table 3.11-2 seems to list 34 land uses. There also does not seem to be any correlation between LDC designations and Table 3.11-2, which is implied in the narrative. Perhaps clarify in the narrative on page 3.11-8 that the LDC grouping is a subsequent process.</p>	SUB 1-128
120	Clarification	3.11-10; paragraph 3	<p>"The majority of medium- and high-density housing in the region is found in the urban core of the region, in Downtown Los Angeles, East Los Angeles, the South Bay, and the "West Side" of Los Angeles. Large cities, such as Long Beach, Santa Ana, Glendale, Oxnard, and Pasadena, also have concentrations of high-density development in their downtown areas. Several beach communities, such as the Cities of Santa Monica, Manhattan Beach, Hermosa Beach, Redondo Beach, Huntington Beach, and Newport Beach, have high density close to the ocean."</p> <ul style="list-style-type: none"> Define 'high-density' If density calculations were made using the Census Bureau geographic boundaries, which include ocean areas for coastal cities, the density calculations may need to be redone. 	SUB 1-129
121	Clarification	3.11-11; paragraph 3	<p>"<u>Multifamily units—a term that SCAG uses to generally classify homes other than single-family detached housing units—are attached residences, apartments, condominiums, and also include townhouses, which are classified by the State and U.S. Census Bureau as single-family attached homes.</u>"</p>	SUB 1-130



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
122	Clarification	3.11-11; paragraph 5	“Duplexes, Triplexes, and 2- or 3-Unit Condominiums and Townhouses. This category is composed of duplexes, triplexes, and 2- or 3-unit condominiums, <u>which are all multi-family structures and townhouses—which are actually attached single-family units that are attached multifamily structures.</u> ”	SUB 1-131
123	Clarification	3.11-11; paragraph 8	“Typically, low-rise apartments, <u>and</u> condominiums, <u>and</u> townhouses occur together in large contiguous areas since land use is restricted to multi-family zoned areas.” <ul style="list-style-type: none"> Townhomes are single-family housing units. 	SUB 1-132
124	Correction	3.11-12; paragraphs 1 & 3	“Medium-Rise Apartments and Condominiums. This category includes multi-family structures of three to four stories and <u>greater than</u> >18 units/acre.... High-Rise Apartments and Condominiums. This category includes multi-family structures of five stories or greater and <u>greater than</u> >18 units/acre.”	SUB 1-133
125	Clarification	3.11-14; paragraph 3	“OPEN SPACE, RECREATION, AND AGRICULTURAL LAND USES... In yet other instances, lands may be designated or zoned as open space but still allow for development of a single-family home. Lands evaluated as natural lands in the Plan are generally evaluated as wildlife habitat in Section 3.4, Biological Resources, and not agricultural lands. In general, in this 2024 PEIR, agricultural lands are farmlands, and natural lands provide valued habitat.” <ul style="list-style-type: none"> Some land that is currently used for agriculture is zoned for other purposes but is temporarily being used for agriculture and the long-term expectation is that the land will be developed for housing or commercial. Please clarify in the narrative whether land classification is by use or by zoning and update any calculations as applicable. 	SUB 1-134
126	Clarification	3.11-16-17; Table 3.11-4	Use full name of Source in tables instead of acronyms. “Source: <u>California Coastal Commission CCC 2019</u> ” and add link to source website	SUB 1-135
127	Clarification	3.11-21; paragraph 4	“The California Coastal Act constitutes the California Coastal Management Program for the purposes of the Federal Coastal Zone Management Act (California Coastal Act of 1976; PRC Section 30000 et seq.). The act established <u>the California Coastal Commission (CCC)</u> , identified a designated California Coastal Zone, and established CCC’s responsibility to include the preparation and ongoing oversight of a Coastal Plan for the protection and management of the Coastal Zone. Each local jurisdictional authority (city or county) with lands within the coastal zone is required to develop, and comply with, a coastal management plan. The Coastal Act requires that any person or public agency proposing development within the Coastal Zone obtain a <u>Coastal Development Permit (CDP)</u> ...”	SUB 1-136
128	Clarification	3.11-21; bullet 1	“a) The project is in a transit priority area;” <ul style="list-style-type: none"> List source and define transit priority area even if defined in a previous chapter 	SUB 1-137
129	3.11.1: Environmental Setting	3.11-24; paragraph 2	Page 3.11-24, second paragraph, discusses the interrelationship between RHNA and the regional transportation plan processes. This section states “The RHNA, which is developed after the regional transportation plan, must	SUB 1-138



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	Sustainable Communities and Climate Protection Act		also allocate housing units within the region consistent with the forecasted regional development pattern included in the SCS." <ul style="list-style-type: none"> Is this an accurate statement relating to SCAG's RHNA and Connect SoCal planning processes?
130	Clarification	3.11-24; paragraph 2	<p>“Previously, the RHNA determination was based on population projections produced by DOF.</p> <p>SB 375 requires the determination to be based upon population projections by DOF and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted used in the regional transportation plan is within a range of <u>1.5 three</u> percent of the regional population forecast completed by DOF for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than <u>1.5 three</u> percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by DOF. <u>Though SCAG’s total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG’s population projections from the applicable 2020 Connect SoCal Plan for the 6th Cycle of RHNA.</u></p>
131	Mitigation Measures: SMM-LU-1	3.11-28	<p>Mitigation Measure SMM-LU-1 states that SCAG shall work with the region's county transportation commissions and Caltrans in the siting of new <u>transportation</u> facilities in residential areas, to minimize future impacts to established communities. Is there any need or value to also referencing the Transportation Corridor Agencies in this mitigation measure? Also recommend that <u>transportation</u> be added to the mitigation measure language, to confirm what is implied intent.</p>
132	Clarification	3.11-33; Map 3.11-1	<ul style="list-style-type: none"> Add page number Source year should be 2019 not 2016 Add data year to title Add link to where land use definitions are Explain if these are the consolidated land use categories and not the original jurisdiction maps
133	Clarification	3.14-1; Bullet list	<p>“Employment: <u>Also known as “jobs”, employment includes both wage and salary workers and self-employed workers. Paid, wage and salary</u> employment consists of full- and part-time employees, including salaried officers and executives of corporations, who were on the payroll in the pay period. Included are employees on sick leave, holidays, and vacations; not included are proprietors and partners of unincorporated businesses.”</p>
134	Clarification	3.14-1; Bullet list	<p>“Housing unit: A house, an apartment or other group of rooms, or a single room are regarded as housing units when occupied or intended for occupancy as separate living quarters. <u>These include single-family and multi-family units as well as accessory dwelling units (ADUs).</u> Different jurisdictions have slightly different definitions of what constitutes a housing unit.”</p>

SUB 1-139

SUB 1-140

SUB 1-141

SUB 1-142

SUB 1-143



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
135	Clarification	3.14-1; Bullet list	“Population: As used in this analysis, population is data available from the U.S. Census Bureau for the SCAG region for the period of 1900 through 2022 2019 and from the State Department of Finance, with population projections available from SCAG in 2023 for the projected population growth through 2050.”	SUB 1-144
136	Clarification	3.14-2; paragraph 2; sentence 5	“Historically, population within the SCAG region was heavily influenced by net migration, or the difference between people coming into an area (immigrating) and the people leaving an area (emigrating) as opposed to natural the increase, which is the number of births over deaths. However, since about 2000, net migration has slowed and has resulted in slower population growth across the SCAG”	SUB 1-145
137	Clarification	3.14-2; paragraph 3; sentence 3	“The change is largely attributed to four key factors: (1) lower birth rates (fewer children), (2) lower immigration rates (fewer immigrants, both domestic and international), (3) aging population (fewer at childbearing age), and (4) high housing costs (lack of housing) (SCAG 2023a).”	SUB 1-146
138	Clarification	3.14-2; Table 3.14-1	Change rates in table to display in percentages instead of raw number, e.g., use 22.6% instead of 0.226 as seen in Table 3.14-7.	SUB 1-147
139	Clarification	3.14-3; paragraph 2; last sentence	“At a fundamental level, there is simply not enough housing for everyone who wants to live <u>on their own</u> in the state.”	SUB 1-148
140	Correction	3.14-4; Table 3.14-3 source	“Connect SoCal 2024 base year, based on 2020 U.S. Decennial decennial Census P.L. 94-171 Redistricting data PL-94 redistricting file and 2019 DOF E-5 estimates”	SUB 1-149
141	Correction	3.14-4; Table 3.14-4 source	“4. U.S. Census Bureau bureau 2020, American Community Survey <u>2020</u> 1-year estimates, Table table B17001 5. U.S. Census Bureau bureau 2021, American Community Survey <u>2021</u> 1-year estimates, Table table S1701 Verify if these are rates (raw number instead of displaying as a percent) or if they are rates per another population number, e.g., per 1,000 people. If raw numbers, change rates in table to display in percentages instead of raw number, e.g., use 23.8% instead of 0.238 as seen in Table 3.14-7 Update title and add notes as needed to clarify.	SUB 1-150
142	Clarification	3.14-7 & 8; Tables 8-10	Ensure totals match data in main RTP report	SUB 1-151
143	Clarification	3.14-11; paragraph 3; sentence 2	“At the time of preliminary <u>Plan</u> forecast development (April 2022) only 12 of the region’s 197 jurisdictions had 6th cycle housing elements which had been adopted and certified by the state.”	SUB 1-152
144	Clarification	3.14-13; paragraph 2; last sentence	“In addition, decisions made regarding the building and expansion of transportation systems divided communities of color and primarily benefited non-Hispanic White white suburban commuters.”	SUB 1-153
145	Clarification	3.14-16; paragraph 2; sentence 3	“In accordance with SB 197, zoning must be updated to reflect the 6th cycle RHNA by October 2025.” <ul style="list-style-type: none"> October 2025 date is inconsistent with other dates of October 2024 listed throughout documents Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date 	SUB 1-154



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic.	
146	Clarification	3.14-16; Table 3.14-11	<ul style="list-style-type: none"> Title "Summary of Housing Goals by County <u>Governments</u> in the SCAG Region" Header: County and City Policies and Ordinances [Note: these are pulled from the Counties' General Plans and not cities] Change listing of 6 counties to <u>County of</u> Imperial <u>County of</u> Los Angeles <u>County of</u> Orange <u>County of</u> Riverside <u>County of</u> San Bernardino <u>County of</u> Ventura 	SUB 1-155
147	Clarification	3.14-22; paragraph 2; sentence 2	"However, transit stations <u>station</u> are generally located in areas that are already developed <u>or</u> where growth is planned and desirable."	SUB 1-156
148	Clarification	3.14-22; paragraph 4; sentence 1	"As discussed above and in Chapter 2, Project Description, the Plan's forecasted forecast regional development pattern provides for a projected population distribution that could occur in 2050. The total SCAG region population is expected to increase by approximately 1.3 million persons by 2050. The Regional Planning Policies and Implementation Strategies included in the Plan would encourage growth in PDAs and reduce <u>minimize</u> growth in GRRAs."	SUB 1-157
149	Clarification	3.14-22; paragraph 7; sentence 1	Please clarify if this is referring to accommodating growth in PDAs and if the housing reference is also to growth. Consider revising to: "Implementation of the Plan would accommodate <u>a majority 60.4 percent</u> of the region's future population <u>growth in PDAs: 60.4 percent of the population growth, 61.2 percent of the household growth, region's future housing units, and 64.8 percent of the future employment growth in PDAs (SCAG 2023d).</u> "	SUB 1-158
150	Clarification	3.14-23	"SMM-POP-1 SCAG shall continue to facilitate collaboration forums, such as through SCAG's <u>Working Housing Group</u> ..."	SUB 1-159
151	Clarification	3.14-24; paragraph 6; sentence 1	"In urban areas, redevelopment often has the potential to displace affordable housing and can disproportionately affect people of color, particularly <u>non-Hispanic Black and non-Hispanic Indigenous</u> populations."	SUB 1-160
152	Clarification	3.14-28; Map 3.14-1	<ul style="list-style-type: none"> Add page number 	SUB 1-161
153	Clarification	3.14-29; Map 3.14-2	<ul style="list-style-type: none"> Add page number Add language to map and/or map page "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally 	SUB 1-162



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			illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."
154	Clarification	3.14-30; Map 3.14-3	<ul style="list-style-type: none"> • Add page number • Add language to map and/or map page "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."
155	Clarification	4-5; paragraph 1; sentence 2	"As a result, Connect SoCal 2024 is SCAG's first RTP/SCS to not modify local data inputs for housing and employment."
156	Clarification	4-6; paragraph 1; sentence 2	"Key components include a forecasted regional development pattern based on expert projection, existing planning documents, <u>and</u> regional policies, and review by local jurisdiction through the year 2050, as well as a transportation network including a list of transportation projects and investments from CTCs on their planned near-term and long-term projects."
157	Section 4.3.2: Plan Elements: Transportation Elements: Work from Home	4-7	This section discusses and defines Work from Home. Please clarify if SCAG's definition of Work from Home applies both to full-time and part-time employees in SCAG's activities-based, travel demand model. Also, is there any estimate of the percentage of Work from Home employees that is assumed in the SCAG modeling?
158	Section 4.4.1: Alternative 1: Transportation Element	4-9 ES-12	The Alternative 1 transportation network is described as including the first year of the previously conforming FTIP. However, in the Executive Summary of the Draft EIR, the Alternative 1 transportation network is defined as including the first two years of transportation projects in the previously-conforming RTP or FTIP. Please review and correct.
159	Section 4.5: Comparison of Alternatives: Alternative 1: Aesthetics	4-12	This section of the Alternative 1 analysis states that "The No Project Alternative would not include any transportation projects that could affect State Scenic Highways or vista points. Has there been a specific review of the Alternative 1 transportation project list to confirm this statement?"
160	Section 4.5: Comparison of Alternatives: Alternative 1:	4-13	This section of the Alternative 1 analysis states that under the Alternative 1: No Build/No Project scenario, that "The potential for conflicts with zoning land use designations, Williamson Act contracts, and/or other applicable regulations that protect agricultural and forestry resources and timberlands

SUB 1-163

SUB 1-164

SUB 1-165

SUB 1-166

SUB 1-167

SUB 1-168

SUB 1-169



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
	Agriculture and Forestry Resources		<p>would also be less because fewer agricultural lands would be converted to nonagricultural uses than under the Plan."</p> <p>Please re-review and verify if this statement is correct. If all the EIR Alternatives share the identical growth projections in population, households and employment, and if the Plan emphasizes infill development and a lesser impact on greenfield development, how would the No Build Scenario have a lesser impact on agriculture lands conversion to developed uses?</p>	
161	Clarification	4-14; paragraph 3; sentence 3	<p>"For example, Segment 1 is in El Centro on the I-8; under the Plan, the segment would experience a decrease in VMT from light- and medium-duty cars of approximately 1,400 as compared to the No Project; however, heavy-duty truck traffic is expected to increase by over 200 daily trips under the Plan as compared to the No Project scenario. Since the majority of DPM (<u>diesel particulate matter</u>) emissions and the associated health risk results from heavy-duty vehicles, the health risk would be greater in this segment under the Plan. The health risk under the Plan is anticipated to be less in most segments as compared to the No Project scenario. The total health risk summed across the analyzed segments under the Plan (1,553 in 1 million <u>people</u>) would be less than the No Project (1,575 in 1 million)."</p> <ul style="list-style-type: none"> Please clarify the 1,400 reference 	SUB 1-170
162	Comparative Discussion of EIR Alternatives	4-17 4-19 4-24	<p>Especially within the same paragraph of EIR discussion, there are instances where the same EIR Alternative is given different terminology, which makes for a very confusing read for the reader to understand the differences, if any. As an example, on page 4-17 and page 4-24,, Alternative 1 is called the No Project Alternative, the No Plan, and the No Plan Alternative.</p> <p>Also, on page 4-19 and 4-24, the Plan is termed both The Plan and Connect SoCal 2024.</p> <p>It would be ideal if the same terminology could be used within the same paragraph to avoid initial confusion.</p>	SUB 1-171
163	Clarification	4-19; paragraph 4	SCAG Natural Lands Conservation Areas- what are these?	SUB 1-172
164	Clarification	4-21; paragraph 1	"Alternative would result in greater impacts related to the wasteful, inefficient, or unnecessary consumption of energy during construction activities and long-term operations and impacts would remain significant."	SUB 1-173
165	Clarification	4-21; paragraph 4	Add definition of "seiche" even if already included in previous chapter	SUB 1-174
166	Clarification	4-22; paragraph 4; sentence 4	<p>"The same is true for existing requirements and regulations addressing potential safety hazards and excessive noise within an airport land use plan or within two miles of a public or public- use airport, so airport-related safety and noise impacts to people residing or working in the Plan area would be the same under this alternative."</p> <ul style="list-style-type: none"> What is the difference between public and public-use airport? 	SUB 1-175
167	Clarification	4-22; footnote & p. 4-35	"Airport Ground Support <u>Equipment</u> (GSE) sources"	SUB 1-176



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
168	Clarification	4-22; last paragraph; last sentence 4-36	<p>"Therefore, the more dispersed land use pattern of this alternative and lack of transportation system improvements would result in greater impacts associated with emergency access <u>along with</u> and emergency response and evacuation plans, and impacts would be significant."</p> <p>Please clarify the listings within the sentence.</p>	SUB 1-177
169	Section 4.5: Comparison of Alternatives: Alternative 1: Population and Housing	4-25	<p>This section of the Alternative 1 analysis states that under the Alternative 1: No Build/No Project scenario, that "the lack of large-scale transportation projects under this alternative would also reduce the potential" for right-of-way acquisition that would lead to potential displacement of existing housing and affected populations. Has the list of programmed FTIP projects in Alternative 1 been reviewed to confirm this statement?</p>	SUB 1-178
170	Clarification	4-25; paragraph 2	<p>"The No Project Alternative assumes a more dispersed growth pattern, which may result in less pressure to redevelop existing sites, <u>and therefore</u> and that are the result in induce direct population growth by encouraging new residential and commercial development within more rural or suburban settings where such growth may not have been planned."</p>	SUB 1-179
171	Section 4.5: Comparison of Alternatives: Alternative 1: Transportation	4-29	<p>This section of the Alternative 1 analysis states that under the Alternative 1: No Build/No Project scenario, that "impacts related to design hazards for transportation projects would be greater, as fewer transportation projects that meet current design standards would be constructed and the Plan's focus on safety would not be implemented."</p> <p>Would this categorical statement be accurate? Is not safety still a requirement for the Connect SoCal 2020 projects that are programmed and included in Alternative 1?</p>	SUB 1-180
172	Clarification	All pages; 4-31; Agriculture and Forestry Resources; e.g. 5-3	<p>Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>	SUB 1-181
173	Clarification	4-34;	<p>"This alternative would result in less <u>fewer</u> impacts related to the wasteful, inefficient, or unnecessary consumption of energy during construction activities and long-term operations."</p>	SUB 1-182



#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
174	Clarification	4-40; paragraph 6	"The performance comparison for the alternatives No-Project Alternatives and the Plan is included in the Connected SoCal 2025 Land Use and Community Technical Report."	SUB 1-183
175	Terminology	5-3 5-6	Page 5-3, Air Quality section, references the "Southern California Air Quality Management District (SCAQMD). Please correct as the "South Coast Air Quality Management District. Page 5-6, Wildfire section, references the need to discourage development in PGAs. In the Glossary, a PGA is defined as "Peak Ground Acceleration." Should the reference be PDA (Priority Development Area)?	SUB 1-184
176	Clarification	5-3	Agriculture and Forestry Resources section discusses land converted to non-agricultural use. Please clarify if the land is zoned for agriculture or being used temporarily with agriculture uses but zoned as another use.	SUB 1-185
177	Clarification	5-4	"Energy: Implementation of the Plan has the potential to result in wasteful, inefficient, or unnecessary energy consumption in the SCAG region."	SUB 1-186
178	Clarification	5-4	"Greenhouse Gas Emissions (GHG): ...Furthermore, while GHG emissions are anticipated to decrease compared to existing conditions, they are not anticipated to be reduced sufficiently to meet the statewide GHG emissions reduction targets and GHG emissions resulting directly and indirectly from the Plan may result in significant and unavoidable impacts." <ul style="list-style-type: none"> • Please clarify the reference to decreasing emissions [as of when] compared to existing conditions. • Reword second part of sentence to clarify the state as a whole isn't meeting the state-level targets even though SCAG has met the state-prescribed target. 	SUB 1-187
179	Clarification	5-8; Paragraph 2	"However, construction activities related to transportation projects and land use development would nevertheless result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment and aggregate supply used in construction." <ul style="list-style-type: none"> • Clarify what "fuel oil" is. 	SUB 1-188
180	Section 5.3: Growth Inducing Impacts	5-10	This section, paragraph 6, page 5-10, states that the Plan does not plan "...for anything more than nominal or by-right growth in rural areas...", in addition to more efficient, compact growth in existing developed areas. Please confirm that the received Local Input from SCAG jurisdictions confirms the statement of there being nominal or by-right growth in rural areas, in the Plan.	SUB 1-189
181	Clarification	5-11; paragraph 1; last sentence	"However, the improved accessibility from the Plan's transportation projects, transit investments, and land use strategies could also facilitate population and economic growth in areas of the region that are currently not developed, despite policies designed to discourage limit such development."	SUB 1-190



Table 3. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add "2024" to all technical report page headers' titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	General Comment	All pages	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
8	General Comment	All pages	Extra commas throughout . . . Example, page 15, 2 nd paragraph, last sentence
9	Correction	p. 11	1 st paragraph, there appears to be an unnecessary quotation mark before "on airport property..."
10	Correction	p. 11	3 rd paragraph, second line, there appears to be an unnecessary parenthesis
11	Clarification	p. 12	2 nd paragraph, spell out Imperial County Airport (IPL)
12	Clarification	p. 20	3 rd paragraph. Should "Approximately 88 percent of travelers at LAX are O&D, and 22 percent are connecting passengers" be modified to add up to only 100%? Right now the total is 110%.
13	Clarification	p. 22	2 nd paragraph, last sentence add "Region" to "Impact of COVID-19 on air passenger and cargo activity in the SCAG"
14	Correction	p. 33	2 nd paragraph, extra parenthesis after NPIAS
15	Correction	p. 52	Last paragraph, delete "go" or "reach" in "economic impacts of airports go reach outside airport property"
16	Clarification	p. 58	3 rd bullet point, is there an extra "ground" in "airport ground airside ground"?
17	Correction	p. 70	Second sentence, delete "from" in "...employees will also access from the region's airports..."
18	General Comment	p. 74	Should SCAG be studying airport operations? Or surface transportation? Should the aviation technical report conclude that SCAG will study surface transportation interplay with aviation, rather than conclude SCAG will study airport planning?



Table 4. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add “2024” to all technical report page headers’ titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.

Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific technical report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.
2	General Comment	All maps with growth forecast and development types data	Add language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone-(TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”
3	General Comment	All pages	Add “Technical Report” and “2024” to the header of each page
4	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION		
			Local Profiles if original data source is U.S. Census Bureau American Community Survey data		
5	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.		
6	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.		
7	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.		
8	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.		
9	General Comment	All pages	Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence” the growth must be feasible		
10	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.		
11	Clarification	All pages	<p>Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>		
12	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”		
13	Define	Add Glossary	Add glossary to technical report and define: ACS BLS DPH	LDX LED NAICS Overcrowding/rates PDA People of color	PUMS QWI racial/ethnic groups Sketch-planning sustainability p. 28 SWAA



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION		
			EDD GRRR Headship rates	PopSyn	WFH
14	Clarification	p. 5; paragraph 5; sentence 2	"Long-range growth in an entire region, or within individual neighborhoods, cannot be <u>specifically</u> predicted; however, probabilistically it is usually more likely to be nearer to the middle of a range than to the extremes."		
15	Clarification	p. 7; paragraph 2; sentence 1	<p>"Between March and November 2022, SCAG staff initiated and completed one-on-one meetings with 164 of the region's 197 local jurisdictions to explain the methods and assumptions behind the preliminary small-area growth forecast, as well as to provide an opportunity to review, edit and approve data the provided maps as well as and provide jurisdiction and TAZ totals for households and employment in 2019, 2035, and 2050."</p> <p>Note: jurisdictions were not asked to approve maps—they were asked to approve data illustrated in map format.</p>		
16	Clarification	p. 7; paragraph 3; sentence 2	Remove or provide definition of "overcrowding rates".		
17	Clarification	p. 7; paragraph 4; sentence 2	"In order to meet the <u>greenhouse gas targets set by CARB</u> and implement the policies of Connect SoCal, these projections must be regionally balanced."		
18	Clarification	p. 7; Table 2	<ul style="list-style-type: none"> • Add grey section header bar above SCAG Region HIOC row. • Bold SCAG region total rows 		
19	Clarification	p. 8; paragraph 1; last sentence	<p>"These county-level projections provide a starting point for an even better balanced vision of 2050 which will require more policies, strategies, and investments in order to achieve."</p> <p>Please clarify sources and responsible parties of policies mentioned.</p>		
20	Clarification	p. 8; paragraph 2; sentence 1	"According to Census 2020, which is the <u>most recent</u> official count of record, the population of the SCAG region as of April 1, 2020 was 18,824,382."		
21	Clarification	p. 9; Figure 3	Change source wording to "U.S. Census Bureau Decennial Census P.L.94-171 downloaded from IPUMS NHGIS, University of Minnesota"		
22	Clarification	p. 10; Figure 4	Change and vary color and format of lines to better differentiate between all.		
23	Clarification	p. 10; paragraph 1	"While population decline is unprecedented in <u>California</u> , a substantial portion can..."		
24	Define	p. 13; paragraph 3	Please provide definition of "people of color".		
25	Clarification	p. 13; paragraph 3; sentences 2-3	"Rooted in historically and spatially embedded inequities, indicators such as household overcrowding and exposure to pollutants are typically higher for people of color; because Because of the markedly younger age structure for people of color, <u>more children will also</u> be disproportionately impacted by <u>this regional inequity</u> ."		
26	Clarification	p. 13; paragraph 4; sentence 2	"The groups whose share of the region are projected to grow by 2050 are (in descending order) <u>non-Hispanic Asian</u> , <u>non-Hispanic Multiracial</u> , <u>non-Hispanic Native Hawaiian/Pacific Islander</u> , and <u>Hispanic/Latino</u> (Table <u>45</u>)."		



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
27	Correction	p. 14; Figure 3.1.3	Shading of Baby Boomers should be much darker shade of blue or white/hollow.
28	Clarification	p. 15; paragraph 2; sentence 2	“This trend is nonlinear over the projection period <u>horizon</u> . By 2035, Baby Boomers will be ages 75 and older, Generation X will be at or approaching <u>their senior years retirement age (65 years+)</u> , and Millennials and Gen Z will be in prime working age <u>(16-64 years)</u> but both will have aged out of prime childbearing age <u>(generally 15-44 years)</u> .”
29	Clarification	p. 15; paragraph 3; last sentence	“By 2022 regional employment had also matched its 2019 pre-COVID peak—which was 447,000 jobs greater than at the 2016 base year of the last Connect SoCal plan <u>(Figure Table 7)</u> .”
30	Clarification	p. 15; Figure 6	<ul style="list-style-type: none"> • Add descriptors of “Housing Units” and “Household Size” to vertical/Y axis on Figure 6. • Lighten color for Single-Family Units as it is difficult to differentiate. • Change title “Figure 6. New Housing Units <u>Permitted</u> and Average Household Size, SCAG Region, 2000-2022” • Change source “Source: CA DOF E-5 and <u>Permits: Construction Industry Research Board New Units from Permits. Household Size: CA DOF E-5 January 1 Estimates.</u> *2019 household size uses SCAG Growth Forecast in lieu of DOF to benchmark to Census 2020.
31	Clarification	p. 16; table 5	Define “headship by age”.
32	Clarification	p. 16; paragraph 2; last sentence	“Due to aging alone, the number of households would be expected to increase by more than 26 percent, compared with 11 percent population <u>overall growth</u> .”
33	Clarification	p. 16; paragraph 4	“Household sizes tend to increase in the years following low housing production. Housing production was especially low over 2008-2013 as a result of the Great Recession—household sizes plateaued at around 3.1 and began to decline precipitously thereafter. This is related to the population growth slowdown coupled with relatively robust housing production, in addition to new Census 2020 data indicating more housing units in the region than were previously known to exist— <u>likely due to better canvassing of neighborhoods and identification of new or non-permitted structures and conversions</u> .”
34	Clarification	p. 16; paragraph 6; sentence 2 sentence 3	<p>“The 53,745 new units <u>permitted</u> in the region in 2022 reflect a higher number of new units than at any single year since 2006. <u>The higher number of units permitted is due in part to the increased in These data likely undercount</u> accessory dwelling unit (ADU) production. A—a newly available data series from the Department of Housing and Community Development show a rapid rise of <u>ADUs</u> in the region in recent years and over 11,000 ADUs in 2021. <u>This suggests that total new-unit construction in recent years is likely even higher than shown in Figure 6.</u>”</p> <ul style="list-style-type: none"> • Please clarify if 53,745 new units are referring to the number of units permitted or units completed. If using CIRB data, it is likely permits issued not units that completed construction. • Why would the data undercount ADUs and why is new unit construction higher? Is this referring to permitting or completed units or legal/permitted units vs. non-permitted units?



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none"> Is CIRB is questioning whether jurisdictions are reporting permits for new ADUs and permits for legalizing non-permitted ADUs?
35	Correction	p. 18; Figure 8; paragraph 1 sentence 2	<p>“Between 2016 and 2019, employment was growing and the P:E ratio declined (Figure 78-B.”</p> <p>Recommend relabeling Figure 8 to Figure 8-A and Figure 8-B.</p>
36	Correction	p. 20; paragraph 1	<p>“Since 2000, SCAG region <u>regional</u> employment in the following four sectors...”</p>
37	Correction	p. 21; paragraph 2	<p>“In constant 2022 dollars, the median wage in the SCAG region was \$23.23 in 2002, \$22.88 in 2012, and \$22.87 in 2022. Table 87 summarizes the wage ranges for each category.”</p>
38	Clarification	p. 22; paragraph 1 sentence 3	<p>“Although the region’s economy recovered quickly from the COVID recession, ...</p> <ul style="list-style-type: none"> Please clarify how recovery is defined--# of jobs? # of businesses? Unemployment rate? Many businesses closed permanently. In 2021, the share of workers working from home shot up to over 19 percent. This trend has stabilized nationally, with approximately 20 percent of U.S. workers able to work from home <u>for all or a portion of their work week</u> (see Kane, Moreno, and Myers 2022).”
39	Clarification	p. 23; paragraph 3; sentence 3	<p>“This model computes population at a future point in time by adding to the existing <u>residential population to</u> the number of group quarters population, births, and in-migrants during a projection period and subtracting the number of deaths and out-migrants.”</p>
40	Correction	p. 26; paragraph 2; sentence 2	<p>“Regional totals by 2-digit NAICS sector are provided at the SCAG region level for 2019 and 2050 (Table 67).”</p>
41	Clarification	p. 27; paragraph 1; sentence 3	<p>“As such, the projection does not reflect a build-out scenario <u>of all general plans throughout the region those some areas may reach first-stage build out or build out of a general plan’s capacity.</u>”</p>
42	Clarification	p. 27; paragraph 1; sentence 4	<p>“Combining the general plan, existing land use, and 2020 Census data above indicate that in the aggregate, local plans in the SCAG region currently have a remaining physical capacity of roughly 8.2 million housing units—several times higher than anticipated household growth—but <u>for these additional units to be realized, the existing structures would have to be demolished and replaced with higher density developments.</u>”</p> <ul style="list-style-type: none"> The ‘remaining physical capacity’ is only capable of coming to fruition if the existing structures are demolished and replaced.
43	Clarification	p. 27; paragraph 3; sentence 4	<p>“The regional growth vision combines an allocation process <u>rooted in based</u> on Connect SoCal 2020 policies and sustainable growth strategies with a Local Data Exchange <u>process</u> to integrate local <u>information and</u> insights and improve accuracy.”</p>
44	Clarification	p. 27; paragraph 4	<p>“For the purposes of the <u>preliminary growth forecast and forecasted regional development pattern growth vision</u>, PDAs are areas within the SCAG Region where future growth can be located in order to help the region reach mobility or environmental goals.”</p>
45	Clarification	p. 27; paragraph 4	<p>“As such, the regional growth vision aims to increase resilience within the region’s built systems by taking advantage of existing infrastructure, social</p>



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			system by promoting complete communities, economic systems by promoting proximity to jobs, and natural systems by mitigating growth in hazardous or sensitive areas.” Should ‘social system’ be plural and what social system/s is being referred to?
46	Clarification	p. 28; paragraph 4	“This step improved forecast accuracy by linking it to <u>entitlements and</u> likely development sites while also providing an avenue to consider regional strategies and targets in local plans.”
47	Clarification	p. 28; paragraph 4; sentence 2	“Unlike prior regional plans in which the locally-reviewed employment projection increased while the household projection decreased, local jurisdictions’ traditional optimism about employment growth was not only matched but was substantially exceeded by optimism about future housing production.” <ul style="list-style-type: none"> • Reword sentence. There are more entitled housing projects and units that are now included in the 2024 RTP; the higher household projection is not just due to optimism.
48	Correction	p. 29; paragraph 1	Change all instances of “PL-94 171” to “P.L. 94-171 Redistricting Data”
49	Clarification	p. 31; paragraph 1; sentence 4	“PUMS data is built by the Census Bureau bureau from hundreds of individual householders’ and associated household members’ responses to ACS survey questions.” <ul style="list-style-type: none"> • Only hundreds of people responded to the PUMS/ACS survey? Clarify if these are hundreds of questions answered by individual householders or hundreds of householders answering questions.
50	Clarification	p. 33 Table 12	Add “(July)” to title to clarify these are July totals.
51	Clarification	p. 34; paragraph 3	“The population’s age structure and racial/ethnic makeup are expected to continue <u>their current, gradual pattern of change seen to change in ways that they have been gradually changing</u> in prior decades (Table 5).”
52	Clarification	p. 35; paragraph 1; sentence 3	“While the non-White <u>racial/ethnic populations other than non-Hispanic White</u> are is younger, the slower projected rate of total population growth means that most racial/ethnic groups would not see as dramatic share changes as they did in the last thirty years. The largest increases are expected in the <u>non-Hispanic Asian</u> and <u>non-Hispanic two-or-more races</u> populations.”
53	Clarification	p. 35; paragraph 6; sentence 2+	“The top three growth sectors during this time period, in terms of jobs added, are Health Care and Social Assistance sector adding <u>415,000</u> thousand jobs, Construction sector adding <u>139,000</u> thousand jobs, and Accommodation and Food Service adding <u>106,000</u> thousand jobs. Job growth in these three sectors make up half of the projected overall job growth for the region. Sectors where a decrease in jobs is projected between 2022 and 2050 are Finance and Insurance sector of <u>32,000</u> thousand jobs and a decrease of <u>16,000</u> thousand jobs in the Administrative and Support and Waste Services sectors.”
54	Clarification	p. 45; paragraph 6; sentence 2	“The Local Data Exchange (<u>LDX</u>) process allowed SCAG to harmonize high-level trends with bottom-up community visions <u>and entitled projects.</u> ”



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
55	Clarification	p. 45; paragraph 3	<p>5.5 TAZ-Level Growth Forecast, Growth Vision, and SCS Consistency</p> <p>Replace section language and corresponding footnote—removing footnote—with the following language:</p> <p>“In order to assess the ability of the Connect SoCal 2024 Plan to meet federal air quality standards and achieve a state greenhouse gas reduction target, SCAG creates small-area projections data for housing, population, and employment, which are known as the Tier 2 traffic analysis zone (TAZ) socioeconomic dataset (SED). Although these data are based in part on input provided by staff from local jurisdictions during the Connect SoCal 2024 Local Data Exchange process, local jurisdictions and projects within the region shall not be held to meet any specific numbers within or aggregates of the TAZ data. Connect SoCal 2024’s TAZ-level household and employment projections are created to provide estimated snapshots in time. These projections do not reflect subsequently available information (given that local jurisdictions provided their local input to SCAG between May and December 2022); and, concerning some jurisdictions, they also do not reflect all currently entitled and pending projects. Additionally, the TAZ data do not project the full build-out and realization of localities’ general plans; and they do not conform to jurisdictions’ current respective housing elements. The local plans and approvals have continued and will continue to evolve; and market forces will continue to play a major role in determining the timing, locations, and different types of development and redevelopment that will occur. Therefore, the applicable jurisdiction(s) should be contacted for the most up-to-date data available.</p> <p>The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.</p> <p>SCAG’s forecasted regional development pattern (FRDP) is not solely based on the TAZ-level household and employment spatial projections. It is utilized to estimate the overall effect of the many policies, goals, and strategies of Connect SoCal—which should not be uncritically applied, individually or en masse, to any particular project or plan. The TAZ-level household and employment growth projections support the region’s ability to model conformity with federal air quality standards and its ability to achieve a state greenhouse gas reduction target; they do not, however, reflect the only set of growth assumptions that may meet these standards and that target.</p> <p>Therefore, insofar as housing and other laws or grants may require comparisons of projects or plans to Connect SoCal 2024, SCAG’s projections that are illustrated in TAZ maps—along with any related documents or</p>



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<p>modeling outputs—may not be used to determine the inconsistency of any plan or project in the region with Connect SoCal 2024. Given that land use decisions are properly made with attention to local contexts and circumstances, local jurisdictions and other lead agencies shall have the sole discretion to determine a local project’s or plan’s general consistency and overall alignment with Connect SoCal.</p> <p>For example, local jurisdictions’ plans and approvals may be found to align with Connect SoCal 2024 if they directionally support a number of its objectives, such as by encouraging a mix of housing types that includes more affordable and multi-family housing rather than solely single-family, for-sale housing; providing for more housing located proximate to employment or vice versa; or encouraging increased use of transit, ridesharing, biking, walking or micro-mobility, or hybrid and remote work to reduce commuting trips. Such alignment is an appropriate basis for a local jurisdiction to determine that a plan or project is consistent with Connect SoCal 2024. Such determinations should be evaluated based on (i) the totality of the goals, policies, and objectives of Connect SoCal 2024 and its associated Program Environmental Impact Report (PEIR), and (ii) the attributes of the local project or plan in overall relation to Connect SoCal, and not in a prescriptive manner by applying SCAG’s TAZ-level data, any aggregate thereof, or any particular one or more goals, policies, or objectives of Connect SoCal 2024 and its associated PEIR.</p> <p>This flows logically from the fact that Connect SoCal 2024 includes dozens of stated directives, policies, goals, objectives, and measurements, any number of which may not be individually applicable to any given project or plan. For example, a project that provides new housing units in conformity with a jurisdiction’s approved housing element can and should be found to be in overall alignment with Connect SoCal 2024 given housing production’s contribution to Connect SoCal 2024 goals and policies, especially those related to affirmatively furthering fair housing, social and economic justice, jobs-housing balance, and the like.</p> <p>Household or employment growth included in the Connect SoCal 2024 TAZ-level SED and maps may assist in determining consistency with the SCS for purposes of determining a project’s eligibility for CEQA streamlining under SB 375 (Cal. Govt. Code § 21155(a)). TAZ-level maps and data may not otherwise be used or applied prescriptively to determine that a project is inconsistent or not in alignment with Connect SoCal 2024 for any purpose, given that myriad other development assumptions could also be found to be consistent or, on balance, aligned with the SCS. Specifically, the TAZ-level data and maps do not supersede or otherwise affect locally approved housing elements, including those adopted in compliance with the 6th Cycle of the Regional Housing Needs Assessment (RHNA).”</p>
56	Clarification	p. 46; paragraph 1	<p>“More small households will form as overcrowding pressures ease, particularly during the first half of the Plan period horizon.”</p>



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
57	Clarification	p. 46; paragraph 3	“While the region showed resilience in the recent recovery from the <u>COVID-19 pandemic-related economic downturn</u> , the pandemic hastened the acceptance of remote work and adoption of technologies that minimize human interaction or that automate work.”
58	Clarification	p. 48; Map 2 p. 49; Map 3 p. 51; Map 5 p. 52; Map 6 p. 53; Map 7	Add language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”

Table 6. ECONOMIC IMPACT ANALYSIS TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific technical report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.
2	General Comment	All pages	Add “2024” to all technical report page headers’ titles
3	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
4	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
5	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
6	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
7	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
8	General Comment	All pages	Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence” the growth must be feasible
9	General Comments	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
10	Clarification	All pages	<p>Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>
11	Correction	All pages	<p>References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”</p>
12	General Comment	All pages	<p>Add “2024 Technical Report” to the header of each page</p>
13	Clarification	p. 2; paragraph 2	<p>“In 2023, the economic impacts of Connect SoCal 2024 on the <u>SCAG-region</u> SCAG region economy are at least as important, if not more. The SCAG region is in a similar situation recovering from the economic shock of the <u>response to the</u> COVID-19 pandemic, which upended nearly every aspect of the regional (and global) economy. COVID-19 had unprecedented impacts on the labor market. For example, pandemic-induced workplace closures drastically changed commuting patterns and employment locations. The pandemic <u>response</u> accelerated the decades-long increasing trend of remote and hybrid work, and because of pandemic-induced technological and cultural change, is likely to persist into the foreseeable future (Barrero, Bloom, and David 2023).”</p>
14	Clarification	p. 2; paragraph 3; sentence 2	<p>“The SCAG region has proven resilient in its recovery from the short but sharp COVID-19 recession. Connect SoCal 2024 investments, policies, and strategies strive to be more than the sum of their parts and capture synergies for the Plan. The intent is to fulfill the Plan’s vision of a healthy, prosperous, accessible, and connected region for a more resilient and equitable futureⁱ. Connect SoCal 2024 adds important emerging priorities for the region: a plan that fosters regional resilience, equitable and inclusive economic growth for all <u>SCAG-region</u> SCAG region residents.”</p> <ul style="list-style-type: none"> • Use footnotes instead of the single endnote in the document



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
15	Correction	p. 2; paragraph 5; sentence 2	“Connect SoCal 2024 details <u>SCAG-region</u> SCAG region -transportation spending exceeding \$413 billion...”
16	Clarification	p. 3; paragraph 2	<p>“Achieving the Plan’s promise of economic growth requires us to recognize that the region faces significant income inequality. For example, in 2021, in the SCAG region,</p> <ul style="list-style-type: none"> • Hispanic workers earned 56 percent of White worker wages, • Black workers earned 72 percent of White worker wages, and • Women earned 81 percent of men’s wages. (American Community Survey, 2021)” <ul style="list-style-type: none"> • Is this using median or average wages? • Are the comparisons controlled for years or experience, education or any other factors?
17	Clarification	p. 3; second set of bullet points	<p>“9.7 percent of the region’s households lived in overcrowded housing compared to 7.0 percent for the rest of California and 3.4 percent for the U.S., and</p> <ul style="list-style-type: none"> • Housing costs overburdened 45 percent of the region’s households” <ul style="list-style-type: none"> • Please define ‘overcrowded’ and include source • Please define ‘overburdened’ and include source
18	Clarification	p. 5; paragraph 4; sentences 1-2	<p>“A mix of transportation projects is is planned in the six SCAG counties over the 26-year model timeframe. Of the total Connect SoCal 2024 expenditures exceeding \$413 billion (constant 2023 dollars).”</p> <ul style="list-style-type: none"> • Second sentence is incomplete
19	Clarification	p. 11; paragraph 2; sentence 2	<p>“Under the Plan and incorporating the network efficiency gains would increase GDP by \$48 billion (2023 constant dollars) annually, on average.”</p> <ul style="list-style-type: none"> • Sentence structure is awkward. Reword for clarity.
20	Clarification	p. 14; paragraph 1; last sentence	<p>“However, the federal government and California agencies such as CARB and CalTrans rely on the SC-GHG based on the work of the Interagency Working Group on Group on the Social Cost of Greenhouse Gases Gasses (“IWG”). Therefore, for our analysis, we utilized adopt the IWG’s IWG SC-GHG.”</p>
21	Clarification	p. 14; paragraph 1; sentence 1 last sentence	<p>“The IWG is a group of scientists convened in 2009 by the <u>federal</u> Council of Economic Advisers and the Office of Management and Budget...</p> <p>However, some damages are difficult to quantify and <u>are</u> omitted from the SC-GHG models, including impacts from increased wildfire...”</p>
22	Clarification	p. 16; paragraph 1; sentence 1	“In addition to <u>the</u> co-benefit of reduced GHG emissions, vibrant, multi-modal places foster increased physical...”
23	Clarification	p. 17; Table 6	Table source: cite original data sources instead of other tables in the report so the table can be extracted and serve as standalone information.
24	Clarification	p. 17; paragraph 1; sentence 2	“However, the SCAG Regional Council adopted the Inclusive Economic Recovery Strategy in July 2021 and, with a grant from the State of California, started implementing strategies for equitable and inclusive economic growth (see Chapter 3 of the <u>2024 Connect SoCal report</u> Main Book)—specifically focusing on racial disparities.”
25	Clarification	p. 17; paragraph 1; sentence 2	“Figure 3 shows that, on average <u>and not controlling for factors such as field of work, years of experience, or education</u> , women earned 81 percent of



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			what men earned in the SCAG region in 2021. <u>Non-Hispanic Black</u> workers earned 72 percent, and Hispanic workers earned 56 percent of <u>non-Hispanic White, non-Hispanic</u> workers' earnings in the SCAG region in 2021."
26	Clarification	p. 18; Figure 3	Change Title: " Percent of <u>Non-Hispanic</u> White Worker Wages" Update categories to <u>Non-Hispanic</u> White <u>Non-Hispanic</u> Black/AA Hispanic <u>Non-Hispanic</u> Nat Am <u>Non-Hispanic</u> Asian/PI Other <u>Non-Hispanic</u> "Notes: Based on 2021 American Community Survey 1-Year PUMS Sample. Includes wage and salary workers in the labor force, age 25-64. Excludes observations with labor income below 1st and above 99th percentiles. All races are non-Hispanic. Hispanic includes any race identifying as Hispanic <u>or Latino.</u> "
27	Clarification	p. 19; paragraph 2; sentence 2	"For illustrative purposes, assuming <u>Assuming</u> that this gain in GDP is equally distributed across industries, we can infer that the economic growth from Connect SoCal 2024 transportation investments we computed in Section 3."
28	Clarification	p. 18; Figure 3	"Notes: Based on data from the 2021 American Community Survey PUMS 1-Year Sample. Includes wage and salary workers in the labor force aged 25-64. Excludes observations with labor income below 1st and above 99th percentiles. All races are non-Hispanic. Hispanic includes any race identifying as Hispanic <u>or Latino.</u> SCAG region GDP estimated at \$1.4 trillion in 2021 (REMI)."

Table 7. EQUITY ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add "2024" to all technical report page headers' titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
7	Correction	All pages	References and source citations to the American Community Survey dataset should use the word "estimates" not "sample", e.g., "Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates" or for



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			PUMS: "Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021"
8	Table 1: Summary of Performance Measures	p. 4 – 8; Table 1	In the Table 1: Summary of Analysis column, it would be helpful to the reader if the condition(s) reported for all the performance measures, are identified as a condition applicable to either an Existing or Plan timeframe. The approach used in Rail-Related Impacts (page 6) is an excellent approach in distinguishing between Base Year and the Plan. Others are unclear, such as Share of Transportation Usage (page 4), and Bicycle and Pedestrian Collisions (page 5).
9	Table 1: Summary of Performance Measures: Impacts From Mileage-Based User Fees	p. 8; Table 1	<p>The Summary of Analysis for the "Impacts from Mileage-Based User Fees" states that "... it is crucial to ensure user fee programs are designed equitable, to insure that vulnerable communities experience the benefits of road pricing without regressive financial impacts."</p> <p>Is there an associated policy recommendation to support this conclusion that should be referenced? In reviewing the Plan Strategies (Section 3.4: Plan Fulfillment), do any of the Regional Planning Policies incorporate this implementation finding? If not, should there be such a policy? The one policy that links closest to the issue is the Funding the System/User Pricing Strategy that states "Study and pilot transportation user-fee programs and mitigation measures that increase equitable mobility." Does "equitable mobility" clearly address tackling regressive financial impacts of any road pricing program to vulnerable communities?</p>
10	4. Analytical Approach: 4.1 Outreach Efforts Not in Priority Equity Communities	p. 17	There is a subsection bullet listing of what appears to be outreach workshop participant input of what should not be designated as Priority Equity Communities. It would help the reader if the bullet listing could be prefaced with an introductory sentence to provide context, such as "Workshop participants further identified several populations that should not be considered when analyzing equity. These include:" [if this is the correct context]
11	Table 3: Priority Population Descriptions Limited Vehicle and Transit Population	p. 21	Table 3 includes a "Limited Vehicle and Transit Population" priority population, and defines this population as "Households with more members than vehicles owned that are not within a census tract that intersects with a High-Quality Transit Corridor." Please clarify if the definition applies to "members <u>of driving age.</u> "
12	Figure 1: Population in Priority Equity Communities by County	p. 22	It would be helpful if Figure 1 also includes a SCAG Region bar of the regional percentage of Priority Equity Population of 48.6%, to provide the reader with immediate visual context of how each county percentage compares to the regional percentage, and avoid having the reader to refer to the preceding paragraph for the context.
13	4.4 Impact Assessment	p. 28	<p>This section of the Technical Report states that "As described in the Main Book, SCAG conducts a 'Plan' vs 'No Plan' (or Baseline) analysis which compares how the region would perform with and without implementation of <i>Connect SoCal</i>."</p> <p>Please clarify if the reference to <i>Connect SoCal</i> is Connect SoCal 2020 or Connect SoCal 2024, since the use of the phrase has been used in SCAG documents to refer to both the 2020 and the 2024 plan.</p>



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
14	5.1 Comparison of Existing Conditions in the Region and in PECs: Asian population	p. 30-31 Table 7	The technical report states that "In contrast, over 60 percent of the region's Hispanic/Latino population Asian population and Native Hawaiian/Pacific Islanders were in Priority Equity Communities." This data does not match with the data in Table 7. Specifically, Table 7 illustrates that the Asian population is at 44.2%. If the Table 7 data is correct, the narrative should delete the reference to Asian populations.
15	5.1 Comparison of Existing Conditions in the Region and in PECs: Average HH Size	p. 30	The technical report states that the average household size in Priority Equity Communities is larger than the region. Is there some comparison data that can be provided? This would be helpful, as there is then a subsequent sentence that states <u>only</u> 46.3% of the region's household were in Priority Equity Communities, as compared to 48.6 percent of the total regional population share. Since households are all the members living in a housing unit, is this comparison of value?
16	6. Analysis: Mobility Vehicle Ownership	p. 37 & 38 Table 6	The technical report, page 37, last paragraph, states that "Figure 6 shows the percentage of householders that do not own an automobile. Almost seven percent of all householders within the SCAG region, and nine percent of householders of color, do not have access to or own a vehicle." Technically, Figure 6 does not illustrate that nine percent of householders of color do not have access to or own a vehicle. Was this an average percentage that was calculated from the raw numbers?
17	6.1 Share of Transportation Usage System	p. 40 & 41 Table 10	Page 40 of the technical report, last paragraph, states that "Black travelers had the second highest share of bus trips at 18.9%, a rate three times the regional usage, the highest usage rate compared to other racial/ethnic groups." There are some internal inconsistencies within the sentence and with the information on Table 10. a) The sentence makes reference to Black travelers having both the second highest share of bus trips as well as the highest usage rate. Based on the information in Table 10, it appears that the Hispanic/Latino population has the highest bus transit usage. b) If the regional share of bus usage is 2.3%, according to Table 10, how did the report calculate that Black travelers use bus transit at a rate of three times the regional usage? Seems to be much higher than three times.
18	6.2 Travel Time and Travel Distance Savings 6.22 Results	p. 41 & 42 Figure 7 p. 43	The Technical Report, page 41, last paragraph, states that "As shown in Figure 7, people of color experience longer travel times and distances using public transportation than auto..." and then continues with certain populations have longer travel time distances than other populations. Page 43: Results, third paragraph, continues to identify comparisons by race and ethnicity for public transportation. a) In reviewing the data on the referenced Figure 7, is the "Bus, Rail, Taxi or Ferry" category for commute times the same as "public transportation"? If that is correct, please also label as "Public Transportation: Bus, Rail, Taxi or Ferry." b) In reviewing the data on the referenced Figure 7, is the "Car or Motorcycle" category for commute times the same as "auto"? If that is correct, please also label as "Auto" so the narrative matches the Figure.



#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			c) If Public Transportation represents those four categories: Bus/Rail/Taxi/Ferry, the narrative/conclusions on pages 41 and 43 do not seem to match up with the data in Figure 7. Please re-review and appropriately correct.
19	6.3 Access to Everyday Destinations: Travel Cost Threshold	p. 52	The Equity Technical Report identifies that it uses a "Travel Cost Threshold" as a metric to measure access to destinations. The narrative on page 52 would benefit from a definition and explanation of a travel cost threshold, to set the context for the information in Table 11: Survey of Metrics for Access to Everyday Destinations.
20	7. Analysis: Communities	p. 77 & 78 Figure 24	The narrative on page 77, last paragraph, states that Figure 24 (on page 78) identifies households without broadband access. Further, that Black households (4.3%) are most likely to not own a computer. When looking at the percentages in the referenced Figure 24, the figure is labeled as "people living in households". Please clarify if the percentages shown in Figure 24 are the number of households (which can be occupied by more than one person), or the percentage of the total population living in those households (i.e., number of households multiplied by an average population per unit factor).
21	7.3.2 Rail-Related Impacts Results	p. 96	<p>The conclusion on rail-related impacts seems to be vague on explicitly explaining the impacts of populations living proximate to railroads and railyards between Baseline and the Plan (e.g., "SCAG anticipates nominal plan impact or small differences between the Baseline and Plan scenarios, and that population changes would generally follow that of the SCAG region.")</p> <p>From an equity perspective, does this section address if the existing Baseline condition is a problem and needs to be addressed, especially if the conclusion is that there will be no significant change with implementation of the Plan?</p>
22	9.2.2 Investments vs Benefits: Results	p. 135 Figure 43	The technical report identifies that Figure 43 illustrates that the Connect SoCal 2024 investments in projects most used by Hispanic/Latino and Asian populations are lower compared to people of other races and ethnicities. Is this an equity issue that warrants greater discussion? Leaves the reader hanging.
23	9.4 Impacts from Mileage-Based User Fee 10. Equity Resources for Action Toolbox: 10.4.5 Road Pricing Programs	p. 142 p. 171	<p>The last paragraph on page 142 states that a Community Advisory Committee "expressed skepticism about road pricing as a pathway to more equitable transportation." This needs to be expanded and summarized as to the concerns expressed by the Community Advisory Committee. If there is skepticism to the equity of road pricing, the technical report should flush out what the concerns were, and whether the three recommended bullet points for pricing-related advocacy, effectively eliminates the fundamental issue or if it still remains.</p> <p>This issue then carries over into the Equity Toolbox: 10.4.5 Road Pricing Programs, which recommends that local agencies and groups "Adjust mitigation of negative impacts on vulnerable communities to reflect the specific impacts of pricing programs and local conditions." This is very vague and unclear and warrants expansion and context narrative.</p>



Table 8. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add “Technical Report” and “2024” to all technical report page headers’ titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
#	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.

Table 9. HOUSING TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add “2024” to the header of each page
2	General Comment	All pages	Within all tables, columns with numbers and their header rows should be right justified.
3	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
4	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	General Comment	All pages	Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence” the growth must be feasible
8	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
9	Clarification	All pages	Pertaining to any discussion on farm land lost or at risk,



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<p>it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>
10	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”
11	General Comment	All pages	Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of “non-Hispanic” even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White...
12	Clarification	p. 1; paragraph 3; last sentence	“This report focuses on housing need and strategies that can support housing production and is complemented by the Land Use and Communities Technical Report which guides where and how development, including housing, may should occur in the region in <u>a way that is in alignment with Connect SoCal 2024.</u> ”
13	Clarification	p. 1; paragraph 4 p. 2 1. Executive Summary Existing Housing Need 2. Why Housing Matters	Page 1, fourth paragraph, discusses the current housing crisis and includes the statement that “A shortfall of housing to meet the needs of the SCAG region have created issues such as cost-burden and overcrowded households.” As has been discussed during the 6th cycle RHNA process, one factor for the significant increase in the SCAG region’s 6th cycle housing need number – as determined by State HCD – is a shortfall of housing to meet the housing needs of the <u>existing</u> population. This existing housing need number was then added to State HCD’s calculation of the region’s future housing need for future population for the State’s 6th RHNA cycle. A discussion and clarification of existing housing need is recommended to be added to the Executive Summary and to Section 2: Why Housing Matters, to enable the reader to understand why there is a backlog of housing need.



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
14	Clarification	p. 1; paragraph 5 1. Executive Summary Barriers to Housing Production	Page 1, paragraph 5, discusses barriers to housing production, which include "lack of resources, community opposition, increasing construction costs, and the fiscalization of land use...". a) For the layperson, an explanation of "fiscalization of land use" would be recommended. b) Also, other factors that challenge housing production include: insufficient funding that can be provided to developers, to help subsidize the cost of building affordable housing units, especially with the elimination of state redevelopment funds; and, conflicting state requirements over housing production versus coastal lands protection on lands governed by the California Coastal Commission. While the sixth paragraph states that "Funding is available from the State to implement plans and projects at the regional and local levels," this sentence downplays the extent of funding needed to assist in housing production.
15	Clarification	p. 1; paragraph 6; last sentence	"Long term SCAG implementation strategies include providing technical assistance to housing element implementation, aligning housing-supportive infrastructure, and continuing its outreach and education efforts." <ul style="list-style-type: none"> What is 'aligning housing-supportive infrastructure'?
16	Clarification	p. 2; paragraph 3; sentence 2	"However, while its core function was to insure home mortgage loans made by banks and private lenders, the FHA refused to insure mortgages in Black neighborhoods, often forcing them to move into urban housing projects and <u>rendering them</u> unable to build generational wealth that accompanies homeownership."
17	Clarification	p. 2; paragraph 5; sentence 2	"Even in neighborhoods where people of color found housing, <u>some</u> urban renewal policies destroyed <u>some</u> existing communities and displaced their residents."
18	Clarification	p. 2; paragraph 6; sentence 1	"Today, the quantitative impacts of the housing crisis such as overcrowding, cost-burden, and <u>low</u> home ownership, disproportionately burden communities of color."
19	Clarification	p. 3; paragraph 2 2. Why Housing Matters	The last paragraph of the "Why Housing Matters" section states that the Technical Report does not specifically define a quantitative threshold for what constitutes affordable housing. Nonetheless, there should be an additional sentence that identifies that the SCAG region jurisdictions, as a whole, must plan for more than 40% of its RHNA housing to be affordable to Extremely Very Low, Very-Low and Low Income households, per the 6th cycle RHNA allocation. This is an important context for the reader to understand, especially when addressing the challenges of housing production.
20	Clarification	p. 3; paragraph 5; 3.1 Local General Plans and Housing Elements	This section, third paragraph, states that "Jurisdictions are required to update their housing elements to demonstrate how they would accommodate future housing need by preparing a sites inventory." As noted in the earlier comment, housing need comprises both existing and future housing needs. Please clarify in the above-referenced statement.
21	Clarification	p. 3; paragraph 5; sentence 3	"In addition to the sites inventory, the housing element must identify existing and special housing needs, such as units at-risk for conversion, overcrowding and cost-burden households, population and household characteristics, seniors, and people experiencing homelessness."



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			<ul style="list-style-type: none"> Use semicolons to clarify meaning: "In addition to the sites inventory, the housing element must identify existing and special housing needs, such as units at-risk for conversion; overcrowding and cost-burden households; population and household characteristics; seniors; and people experiencing homelessness."
22	Clarification	p. 4; paragraph 1 3.2 RHNA Local COG	This section, first paragraph, states that "The [RHNA] allocation for each jurisdiction is developed by a local Council of Governments (COG) such as SCAG." Is a "local" COG an accurate description of SCAG, or is "regional" a more appropriate descriptor?
23	Clarification	p. 4; paragraph 1; sentence 4	"The RHNA process is repeated every eight years to ensure that the State's housing needs are being <u>addressed</u> met and coincides with the housing element update period."
24	Clarification	p. 5; paragraph 1; sentence	"Meanwhile, these factors strengthen SCAG's Connect SoCal regional strategies of growth near destinations and mobility options. <u>These strategies include</u> such as emphasizing land use patterns that facilitate multimodal access to work, educational and other destinations and prioritizing infill and redevelopment of underutilized land to accommodate new growth and increasing amenities and connectivity in existing neighborhoods."
25	Clarification	p. 5; paragraph 2	"The 6th cycle final RHNA plan was adopted by SCAG in March 2021."
26	Clarification	p. 5; paragraph 3	"Together with the General Plan and housing element, the RHNA allocation is a vision of a local jurisdiction's household need and the ways to accommodate its existing and future need while achieving its goals." <ul style="list-style-type: none"> Clarify who and what goals is being referred to at the end of the sentence.
27	Clarification	p. 5, 6 4 Existing Conditions	This section, first paragraph, states that "An analysis of existing conditions for the region's housing characteristics provides insight on housing trends, helps identify housing issues communities are facing, and predicts the future needs of the region." How does an existing conditions analysis predict future needs? Please provide a clarifying example or eliminate the reference. The last sentence of Section 4 (on page 6) is perhaps a more appropriate descriptor: "Evaluating the region's housing existing conditions helps SCAG understand the challenges the region is facing to develop implementation strategies and policies to alleviate these challenges moving forward."
28	Clarification	p. 6; paragraph 2	" <u>According to [insert agency data is sourced from], as of 20xx, the</u> The SCAG region has hosts a total of 6,622,509 units in its housing stock. Over half of these units were built before 1980, approximately over 40 years ago. The SCAG region follows California's trend of increasing housing production until 1980 when housing production began begins to decrease dramatically each year thereafter, which has led to a housing shortage (Figure 1). Moreover, Senate Bill 375 (SB 375) became law in 2008, but since then, only 5 percent of total housing stock has been built. While this indicates that growth in housing supply has been slower than anticipated, it also indicates a significant barrier to realizing the vision of SB 375 as the only way to get more housing near transit is to also have more housing overall."



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			<ul style="list-style-type: none"> In last sentence, why is housing supply 'slower than anticipated'? Sentence is unclear, please reword.
29	Clarification	p. 6; paragraph 2; last sentence 4.1 Housing Stock SB 375 reference	<p>"...realizing the vision of SB 375 ... to get more housing near transit, is to have more housing overall."</p> <p>The directive of SB 375 is to reduce greenhouse gas emissions through a complement of land use planning and transportation investments. Please provide a statute citation that documents that SB 375 calls for having more housing overall in order to have more housing near transit.</p>
30	Clarification	p. 6; paragraph 3	<p>Geographically in the SCAG region, as As housing production continued to decrease dwindle in Los Angeles County, housing production stayed strong in the Inland Empire, which encompasses Riverside and San Bernardino Counties. Determining where housing is needed is a major geographical challenge. Housing production is needed across the region, and in addition to infill areas and other urban locations, housing is still needed in less dense and connected areas. The underproduction of housing has had negative impacts implications on people throughout the region, leading to overcrowding and additional cost burden that disproportionately affect communities of color.</p> <p>Figure 1. SCAG Counties' Counties 2021 Housing Stock"</p>
31	Clarification	p. 7; paragraph 1; sentence 2 4.1 Housing Stock Housing Built before 1990	<p>Page 7, first paragraph, makes an argument that living in a home built before 1990, "when combined with other conditions such as substandard facilities, cost burden, overcrowding and housing <u>under</u>production ... results in a scenario where the region is not meeting the housing needs of who is already here in the region."</p> <ul style="list-style-type: none"> Please provide a citation of source of this conclusion that housing structure age is a key determinant of why the region is not meeting its existing housing need. And further, how the age of a housing structure "results in a scenario of disproportionate burden and inequity." In looking at the Section 4.3: Complete Facilities narrative on pages 10-11, there is no discussion or presentation of data about the age of the housing structure as it relates to the units inventoried as lacking kitchen or plumbing facilities.
32	Clarification	p. 7; paragraph 2; sentence 3	<p>"In every county <u>in the SCAG region</u>, there are more homeowners than renters, except for Los Angeles County which has a 55 percent renter-occupied housing rate. However, a look at housing tenure among communities of color reveals an inequitable distribution of homeownership."</p>
33	Clarification	p. 7; paragraph 3; sentence 3	<p>Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of "non-Hispanic" if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic</p>



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			Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly. For example: "According to SCAG's 2022 Racial Equity Baseline Conditions Report, 61 percent of <u>non-Hispanic White</u> households owned their home compared to only 58 percent of <u>non-Hispanic Asian/Pacific Islander</u> households, 44 percent of <u>Hispanic (or Latino)</u> households, 36 percent of <u>non-Hispanic Black</u> households, and 47 percent of <u>non-Hispanic Native American</u> households. This means that <u>non-Hispanic White</u> household homeownership is nearly twice the rate of <u>non-Hispanic Black</u> households."
34	Clarification	p. 9 Figure 5 4.2 Housing Tenure By Race & Ethnicity	When discussing home ownership by race and ethnicity, the narrative on page 7 cites SCAG's 2022 Racial Equity Baseline Conditions Report, while Figure 5 cites U.S. Census Bureau data. The use of two cited sources results in homeownership percentage figures that are close but not consistent. <ul style="list-style-type: none"> • Please specify whether the racial/ethnic categories are all for non-Hispanic groups other than <u>Hispanic (or Latino)</u>; if so, add "non-Hispanic" to categories other than Hispanic/Latino.
35	Clarification	p. 10 4.3 Complete Facilities	This section, first paragraph, states that "there are still 80,909 units lacking complete kitchen facilities and 22,282 units lacking complete plumbing facilities in the SCAG region." <ul style="list-style-type: none"> • Please also include the total number of housing units in the SCAG region, to provide context on the extent of substandard units. • Cite source and year of data. • Note that JADUs do not require a separate bathroom but are considered a housing unit. • The U.S. Census Bureau counted thousands of additional housing units in the SCAG region that were not estimated by State DOF or reported by cities and counties as officially permitted units. Many of these are presumed to be non-traditional living quarters and may not have full kitchen or plumbing. The Bureau states that "Even tents, old railroad cars, and boats are considered to be living quarters if someone claims them as his or her residence." (page B-8 https://www2.census.gov/programs-surveys/decennial/2020/technical-documentation/complete-tech-docs/summary-file/2020Census_PL94_171Redistricting_StatesTechDoc_English.pdf) If people were living in these structures/objects at the time of the 2020 Census, these were counted as 'housing units' and reported in the 2020 Census housing count that is used as a benchmark by DOF and most agencies.
36	Clarification	p. 10; paragraph 2	Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of "non-Hispanic" if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly.



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			For example: “This issue becomes more pronounced when analyzing rates among communities of color and comparing them to <u>non-Hispanic White</u> communities and regional averages. SCAG’s 2022 Racial Equity Baseline Conditions Report found that in the SCAG region, <u>non-Hispanic Native Americans</u> and <u>non-Hispanic Black</u> residents are three times more likely to live in housing units without plumbing facilities than <u>non-Hispanic White</u> households (1.1 percent, 0.7 percent, and 0.3 percent, respectively). Across the region, 1.4 percent of <u>non-Hispanic White</u> residents live in housing units without complete kitchen facilities, compared to 2.0 percent for <u>non-Hispanic Native Americans</u> and 1.8 percent for <u>non-Hispanic Asians/Pacific Islanders</u> . This inequity is particularly apparent in rural Imperial County, where one out of every 20 <u>non-Hispanic Black</u> residents (about 5 percent) live in housing units without complete kitchen facilities, which is significantly higher than the overall county rate of 0.9 percent. A similar trend is found in Ventura County where 3.1 percent of <u>non-Hispanic Black</u> people live without kitchen facilities compared to <u>non-Hispanic White</u> people at 1.2 percent. ⁶ The disproportionate rates of substandard housing in communities of color compared to <u>non-Hispanic White</u> communities and the overall average suggest that the production of more housing in these communities, especially in rural and non-infill areas, can address historical disparities.”
37	Clarification	p. 11, Figure 8 4.3 Complete Facilities	a) Figure 8 does not have any bar illustrating the percentage of White households that lack kitchen and plumbing facilities. Is the first "Other" bar incorrectly labeled, and should be the "White" bar at 0.19%? b) Also, there is no discussion about the information in Figure 8, in the narrative. The narrative cites SCAG's 2022 Racial Equity Baseline Conditions Report, where the lack of kitchen facilities is independently quantified from the lack of plumbing facilities. Figure 8, on the other hand, tabulates the percentage of households (by race and ethnicity) lacking kitchen and plumbing facilities <u>combined</u> and not separately. As a result, the percentage numbers between the narrative and Figure 8 do not match. c) Please specify whether the racial/ethnic categories are all for non-Hispanic groups other than Hispanic (or Latino); if so, add “non-Hispanic” to categories other than Hispanic/Latino.
38	Clarification	p. 12; paragraph 1; sentence 3	“Households that spend more than 30 percent of their income on housing are considered <u>cost burdened</u> “overpaying” and will have less income to spend on both essential needs, such as food and transportation, and discretionary purchases.” <ul style="list-style-type: none"> “overpaying” is not the same as “cost-burdened”- overpaying is associated with the cost of the rent, not the share of income being paid on rent.
39	Clarification	p. 12, 13 Figure 9 Figure 10 4.4 Cost Burdened Households	This section discusses the percentage of cost burdened households, across several referenced years (2012, 2019 and 2021). However, the percentages cited in the narrative, do not match the information in Figure 9 or Figure 10. Please re-review and correct. One issue could be that the narrative separates a discussion of renters versus owners, whereas the Figures could possibly be a combination of all households (i.e., renters <u>and</u> owners). However, the discussion relating to all households (renters and owners) on



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		2012, 2019, 2021	page 12 and supposedly illustrated in Figure 10, still does not match. And the conclusion: that 43.2% of all occupied housing units in the SCAG region are cost-burdened, does not seem to be illustrated in Figure 10. Depending on the corrections needed, update the last sentence: “However, in Orange County, the ratio of severely cost-burden households of <u>all overall paying</u> renters increased by 2.4 percent.”
40	Clarification	p. 14; Figure 11	Please specify whether the racial/ethnic categories are all for non-Hispanic groups other than Hispanic (or Latino); if so, add “non-Hispanic” to categories other than Hispanic/Latino.
41	Clarification	p. 14; paragraph 1; sentence 2	“All other racial and ethnic households experienced greater cost burden regardless of whether they rent or own their homes than when compared to <u>non-Hispanic</u> White households. Hispanic (<u>or Latino</u>) and <u>non-Hispanic</u> Black homeowners and renters experience the greatest cost burden across racial and ethnic households in the SCAG region.”
42	Clarification	p. 16; paragraph 1; sentence 2	“When considering income, there are emerging inequities for households with very low income.” This sentence is unclear and does not explain emerging inequities. “Severe <u>cost burden overpayment</u> is a particular burden for low-income families, who have extremely limited resources to spend on daily needs such as transportation, food, and healthcare in addition to housing costs.” Use consistent language throughout document.
43	Clarification	p. 16; paragraph 2 & 3	Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of “non-Hispanic” if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly. For example: “A disparity in cost burden emerges in a further analysis between communities of color and <u>non-Hispanic</u> White communities. Across the region, <u>non-Hispanic</u> Black, Hispanic (<u>or Latino</u>), and <u>non-Hispanic</u> Native American households – regardless of whether they own or rent – experience the greatest housing cost burdens. While a little over one of four <u>non-Hispanic</u> White households pay more than 30 percent of their income on rent, almost one out of two Hispanic (<u>or Latino</u>) households do (46 percent). This figure is 41 percent for <u>non-Hispanic</u> Black households and 33 percent for <u>non-Hispanic</u> Native American households. The high burden of housing costs carries over into homeownership. For Hispanic (<u>or Latino</u>) home-owning households, 18 percent are cost burden and is 14 percent and 17 percent for <u>non-Hispanic</u> Black and <u>non-Hispanic</u> Native American households, respectively. This is significantly higher than the rate for <u>non-Hispanic</u> White home-owning households at 10 percent. Considering that communities of color have almost twice the rate of poverty (households below 200 percent the poverty line) than the <u>non-Hispanic</u> White community (41 percent and 22 percent, respectively), cost



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			burden inequities further widen for these communities since fewer resources are available to spend on necessities such as food, transportation, and healthcare.”
44	Clarification	p. 16 4.4 Cost Burdened Households By Race & Ethnicity	<p>a) The page 16 discussion on cost-burdened households by race and ethnicity and the SCAG region overall, cites percentages that seem to lack a data source. Is this also SCAG's 2022 Racial Equity Report (the Source Reference #7 at the end of the last sentence in the third paragraph of this section)?</p> <p>b) It would also be helpful to the reader if the cost burdened information by race and ethnicity could also be presented in a Figure, to allow for a more streamlined comparison of the data.</p>
45	Clarification	p. 16 & 18; +Figure 14 4.5 Overcrowding	<p>a) The Overcrowding discussion, starting on page 16, states that the U.S Department of Housing and Urban Development defines overcrowding as more than 1.01 persons per room in a housing unit. Please include a footnote or clarification that there are certain rooms in a housing unit that are excluded from the 1.01 persons per room calculation, and identify said rooms that are excluded.</p> <p>b) Please reference in the narrative discussion, the associated Figures that illustrate the overcrowding data (e.g., Figure 12, Figure 13, Figure 14 and Figure 15, where applicable in the narrative discussion).</p> <p>c) The narrative also states that "Since 2012, these [overcrowding] percentages have slightly decreased." Please clarify if "these" refers to Los Angeles County or the SCAG region. Unclear.</p> <p>d) Figure 14 is: missing/misabeled the bar to illustrate the percentage of White households experiencing overcrowding. The title of Figure 14 should also reference that it is households that is being depicted.</p> <p>e) Figure title suggests data is broken out by race and ethnicity; please clarify if all groups listed mutually exclusive or if it is 'select racial/ethnic' categories being reported if only Whites are broken out as being Hispanic or not. Figure should be labeled accordingly.</p> <p>f) The narrative on the second paragraph of page 18 states that Black and Asian/Pacific Islander households have overcrowding rates of 3 and 4 percent, respectively. If the report is rounding up the percentages illustrated in Figure 14, the percentage for Asian/Pacific Islanders should be revised from 4 to 5 percent, similar to what was done for the Black households data.</p>
46	Clarification	p. 18; paragraph 2	<p>Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of "non-Hispanic" if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly.</p> <p>“Similar to other data on existing conditions shared in this chapter, communities of color represent a disproportionate amount of the SCAG region’s <u>overcrowded population</u> overcrowding data. Across the region,</p>



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			there is a much higher likelihood for Hispanic (<u>or Latino</u>) households to be living in overcrowded housing with approximately one out of 10 <u>households</u> in overcrowded conditions at 10 percent, while <u>non-Hispanic White</u> households have a rate of about one out of 100 (1 percent). While lower than Hispanic (<u>or Latino</u>) households, <u>non-Hispanic Black</u> and <u>non-Hispanic Asian/Pacific Islander</u> households also have higher overcrowding rates at 3 percent and 4 percent, respectively. ⁸
47	Clarification	p. 19; paragraph 1; last sentence	<p>“Housing prices and rents increase further out of reach for existing residents.”</p> <ul style="list-style-type: none"> • Sentence seems incomplete.
48	Clarification	p. 19; paragraph 2	<p>“This neighborhood change of a <u>lower-income neighborhood</u> an initially lower socioeconomic status transitioning to one of higher <u>income and socioeconomic status</u>, also known as gentrification, is considered as a precursor to rising housing costs and displacement....The same study noted there was no significant relationship between rent increases and losses of low-income White households.⁹”</p> <ul style="list-style-type: none"> • Does the last sentence refer to Whites that may also be Hispanic or Latino or non-Hispanic Whites?
49	Clarification	p. 20-21; Figure 16 Figure 17 4.7 Homelessness	<p>a) Label Figures 16 and 17 or revise the titles of these figures, to clarify that the numbers on the vertical axis represent the homelessness population.</p> <p>b) On Figure 14, there are references to the plotted data such as "Santa Ana, Anaheim/Orange County," "San Bernardino City & County," "Riverside City and County," and "Oxnard, San Buenaventura/Ventura County." Please include a footnote explaining if the "County" references refer to the homeless population in county unincorporated territory in addition to the cities cited, to avoid a misinterpretation that it refers to the number of homeless in the entire county boundary. Also, the graph approach is very difficult to read and perhaps a table of the data would be a better approach to identify the change in the homeless population across the years.</p> <p>c) are the geographic areas reported for Health Care Agencies or some other type of agency? Please add the agency type to the title of Figure 16.</p>
50	Clarification	p. 21; paragraph 1	<p>“According to California Continuums of Care (COC), the unhoused population count for CoCs across the SCAG region were 53,729 in 2012 and <u>increased jumped</u> by 38 percent to over 74,000 in 2019. However, in 2021 the count dropped <u>significantly</u> to less than 23,000 and <u>then increased jumped</u> to almost 85,000 in 2022; meaning that the unhoused population <u>increased overall jumped</u> by 58 percent in the last decade <u>but is still lower than the 2006 count of XXXXX</u>. The reason for the 2021 fluctuation may be caused by undercounting due to the pandemic <u>and associated shutdowns</u>.”</p> <p>Please add count for 2006 into narrative.</p>
51	Clarification	p. 22; paragraph 2; last sentence	<p>“In contrast, only 14,000 units were permitted at its lowest point in 2009, during the <u>low point peak</u> of the most recent housing recession.”</p>
52	Clarification	p. 22, 23-24 Figure 18 Figure 19	<p>This entire discussion about how many building permits were issued in the SCAG region, for single- and multi-family units, needs to carefully be re-reviewed and revised, both in the narrative discussion and in Figures 18 and 19. Does the data represent the number of building permits issued, or the number of units that were permitted? Clarity on this issue is especially</p>



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		5 Housing Production: Building Permits Issued versus Housing Units Permitted	critical for multi-family development, where one building permit can be issued for one building that incorporates tens or hundreds of residential units within that one building. This clarity would also affect the conclusions about trends. What should be depicted is the number of units that were permitted, not the number of building permits issued. The latter has no real relevance to housing supply diversity, since it does not represent the total number of housing units that were constructed. a) For example, if the data represent the number of units permitted, then change the title of Figure 18 to: “SCAG Region <u>Number of Housing Units Permitted</u> Building Permits Issued ” and “The share of total <u>units permitted</u> permits by housing type also fluctuated over the past four decades.” b) Figure 19. SCAG Region <u>Shares of Housing Units Permitted by Type</u> Building Permits Issued Percentage
53	Clarification	p. 23; paragraph 2; last sentence	“While one could conclude that the SCAG region collectively met a substantial portion of its total housing need, a significant percentage of affordable housing need was largely unmet as illustrated in Figure 19.” <ul style="list-style-type: none"> Explain how the affordable housing need was unmet and how Figure 19 illustrates that.
54	Clarification	p. 24 Figure 20 5 Housing Production: 5th Cycle RHNA	The discussion on the 5th cycle RHNA should: a) first reference that this discussion is HCD information on the 5th RHNA cycle, and should also include information on the dates of the planning period of the 5th RHNA cycle, in addition to the 6th RHNA cycle, to give the reader some context. b) What does "fulfillment" mean? Is it the number of building permits issued, or residential units finalized? Change title to “Figure 20. SCAG Region 5th Cycle RHNA <u>Share of Income Category Fulfillment Percentage</u> (Units Permitted)”
55	Clarification	p. 24; paragraph 2	“The trend of producing only a small portion of affordable housing combined with factors such as homelessness, and for communities of color lower homeownership rates and increased cost-burden, overcrowding, and substandard housing, suggest a problem that extends beyond supply and demand.” First sentence is difficult to understand. Reword or use additional punctuation to clarify.
56	Clarification	p. 25 Figure 21 Paragraph 2 5.2 Challenges in Meeting Housing Needs	The narrative in this section discusses the ratio of housing units produced per persons added to the region, over five distinct decades. When discussing how the ratio of units to population increased or decreased, is the correct relationship being understood? Would the use of the term "improved" or "worsened" be clearer? Change title to “Figure 21. SCAG Region <u>Housing Unit vs. Population Growth Comparison</u> ”
57	Clarification	p. 26; paragraph 5	“In addition to the new requirements of realistic development capacity, achieving compliance has also become stricter. Jurisdictions in the SCAG region that achieved compliance by October 2022 have until February 2025 to complete any necessary rezonings. Jurisdictions that did not achieve compliance by October 2022 must now complete necessary rezonings



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			<p>before they can receive HCD approval. This poses a problem for jurisdictions that need funding to implement their housing element but cannot achieve the grant requirement of housing element compliance due to the inability to undertake the rezonings.”</p> <ul style="list-style-type: none"> • Language regarding deadlines for rezoning is not consistent across RTP documents. Review and ensure correct dates are reported across all documents. • Is the February 2025 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned and inconsistent with other documents and sections that mention an October 2024 deadline. Please check dates against statute and update as applicable throughout all documents regarding this topic.
58	Clarification	p. 26; paragraph 6	<p>“In the early 21st century, expansion on the urban fringe continued in some places, though the region’s fragile and rugged natural landscape—as well as sheer distances—present substantial limits.”</p> <ul style="list-style-type: none"> • Remove “fragile” or expand on what this means
59	Clarification	p. 27; paragraph 4	<p>“Beyond planning challenges, the cost of building residential units is another primary barrier to meet housing need. Not only does it include construction costs, such as the cost of land, materials, and labor, but jurisdictional processes, <u>state mandates</u>, and environmental requirements can also add cost to the process.”</p>
60	Clarification	p. 27; paragraph 7; sentence 2	<p>“Issues such as a smaller workforce pool after the last recession in <u>20xx</u>, an aging workforce where one in five workers is currently over 55, and strong competition from related...”</p> <ul style="list-style-type: none"> • Specify which recession is being referred to.
61	Clarification	p. 28; Table 2	<p>“Table 2. California Cost Construction <u>Costs</u> Annual Percentage Change”</p> <ul style="list-style-type: none"> • Are these all types of construction or just housing? Perhaps include clarification in title.
62	Clarification	p. 29 Section 5.2	<p>The Insufficient Resources discussion states that a lack of local jurisdiction staffing or funding to implement affordable programs or design zoning codes can be a restriction to encouraging housing production. Please cite the survey or source of this conclusion.</p>
63	Clarification	p. 30 5.2 Challenges in Meeting Housing Needs: Development and Impact Fees	<p>In the discussion on development impact fees on page 30, reference is made to needing these fees “to support the approval of the development such as staff time for permitting, inspections.” There may be confusion between a local jurisdiction imposing a processing fee, where the fee is used to cover the cost of staff time to review and process the development application and associated environmental analyses, versus a development impact fee, which is used to assess a pro rata share of fees to cover local, county or regional need for schools, parks, or infrastructure that are needed to support the increased population generated by the proposed project.</p>
64	Clarification	p. 31; paragraph 2	<p>“As illustrated in previous sections, <u>multiple factors that are found throughout the planning and building process contribute to the causes of the housing crisis</u> are at various points in the process to plan and build housing. ... The following section describes a snapshot of funding for</p>



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			planning and building housing, technical assistance offered by SCAG, and strategies implementable by local jurisdictions— <u>all of which may contribute to increasing the— all various ways to increase housing supply.</u> ”
65	Clarification	p. 32; paragraph 2	<p>“SB 2 also established the Permanent <u>Local Housing Allocation (PLHAPHLA) program</u>. Under this grant, the amount of PLHA funding for entitlement jurisdictions is based on the formula funding for the Community Development Block Grant (CDBG) Program for a five-year period, and through a competitive grant program to non-entitlement jurisdictions. As of Round 3, all awarded applicants in the SCAG region were entitlement jurisdictions....”</p> <ul style="list-style-type: none"> Briefly explain what ‘non-entitlement’ and ‘entitlement’ jurisdictions are and if this means that some agencies qualify under certain parameters or not. Perhaps refer reader to location to find more detailed information.
66	Clarification	p. 37; paragraph 1	“There are a variety of strategies and tools that local jurisdictions and stakeholders can employ to plan for and <u>facilitate the building of build housing.</u> ”
67	Clarification	p. 37; paragraph 5	<p>“15-minute communities draw social and economic resilience benefits that address shocks and stressors including households with limited mobility options, the age dependency ratio, and limited tree canopy/urban heat island effect.”</p> <p>Do 15-minute communities draw or create benefits?</p>
68	Clarification	p. 38; Figure 23	Figure title suggests data is broken out by race and ethnicity; please clarify if all groups listed mutually exclusive or if it is ‘select racial/ethnic’ categories being reported if only Whites are broken out as being Hispanic or not. Figure should be labeled accordingly with “non-Hispanic” for each category other than Hispanic or Latino if the data actually reflect race categories broken out by Hispanic/Latino ethnicity. A note should be added to the Figure if only the White category is non-Hispanic and all others may include Hispanics or Latinos.
69	Clarification	p. 39; Age dependency ratio	The narrative discusses the age dependency ratio as being “measured by the percentage of the population younger than 20 years old and older than 64.” The typical age dependency ratio is the population under 15 and 65+. Please verify SCAG’s definition and if ratio used deviates from traditional ratio, explain why the ratio was changed.
70	Clarification	p. 39, 40 Figure 25 7 Best Practices for Jurisdictions and Stakeholders: Tree Canopy	Please clarify how an area that is or is not covered by tree canopy, is determined. Is this done on a parcel by parcel basis, or the number of trees located by area or acreage, or other factor? Please provide a summary of the State Department of Public Health’s methodology, given that the SCAG region is identified as having more than 90% of its acre not covered by tree canopy. Also, perhaps there should be some discussion about the breadth of geography that the SCAG region encompasses, which includes high desert communities.
71	Clarification	p. 39; paragraph 2	<p>“These communities are more susceptible to the effects of extreme heat events and offer less carbon sequestration, making the community overall a less pleasant place to engage in activities.”</p> <ul style="list-style-type: none"> Please clarify if ‘activities’ include everything or if it is referring to physical and/or outdoor activities.



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72	Clarification	p. 40; Figure 25	Include year of data being reported in title and source.
73	Clarification	p. 41; paragraph 1	<p>“Once inefficiencies are identified, jurisdictions can implement strategies such as consolidating the review process, creating multiple points of entry to secure a building permit, creating an expedited process for certain types of projects such as affordable housing, updating permitting software, and lowering the threshold for project to receive a ministerial permit.32”</p> <ul style="list-style-type: none"> • What are “multiple points of entry to secure a building permit”?
74	7.4 Housing Supportive Infrastructure	p. 42	The second paragraph on page 42 states "Moreover, many jurisdictions do not have an updated to date assessment of their utility infrastructure.....". Perhaps this should read "updated assessment" or "up-to-date assessment"?
75	Clarification	p. 44	Ensure language of regional planning policies is the same as in the main Connect SoCal document.

Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific technical report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.
2	General Comment	All maps with growth forecast and development types data	Add language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”
3	General Comment	All pages	Add “2024” to all technical report page headers’ titles
4	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
5	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
6	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
8	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
9	General Comment	All pages	Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, otherwise known as "Spheres of Influence" the growth must be feasible
10	General Comment	All pages	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
11	Clarification	All pages	<p>Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>
12	Correction	All pages	References and source citations to the American Community Survey dataset should use the word "estimates" not "sample", e.g., "Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates" or for PUMS: "Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021"
13	General Comment	All pages	<p>The phrase "natural and farmlands" is used throughout this and other documents. To clarify, amend phrasing, e.g., 'natural lands and farm lands' or 'natural and farm lands'. Example on page 2 paragraph 2 second sentence: "This chapter also covers climate resilience, and natural and farmland preservation, and complete communities"... where the current wording language does not make sense to say "...and natural preservation"</p> <p>Please revise phrasing and proliferate throughout all documents.</p>
14	Clarification	p. 1; bullet 1	"Regional Housing Needs Assessment (RHNA), the <u>state-mandated state mandated</u> vehicle for identifying <u>and allocating</u> housing need in the state."
15	Clarification	p. 1; bullet 5 on page	"SCAG's Racial Equity Early Action Plan, defined racial equity for SCAG and established a series of goals and strategies for SCAG to advance racial equity in the region. The Racial Equity Early Action Plan has spurred



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			additional racial equity centered work including the convening of the Racial Equity and Regional Planning Subcommittee, <u>which</u> developed a series of recommendations to advance racial equity in the Plan. These recommendations are reflected throughout the Plan.”
16	Clarification	p. 2; paragraph 1; sentence 4	“The Local Data Exchange process informed the FRDP through a series of touchpoints with local jurisdictions where they were presented with information on project growth in their jurisdictions for input to ensure <u>entitlements were accurately reflected and the PDAs and GRRAs were considered these assumptions were reflected in local plans.</u> ”
17	Clarification	p. 4; paragraph 2; sentence 1 last sentence	“Under SB 375, SCAG’s role is to coordinate the development of the Connect SoCal 2024 land use pattern in partnership with local jurisdictions that are ultimately responsible for <u>land use planning and management implementing it.</u> ” “This included information on land use, transportation, priority development areas, geographical boundaries, resource areas, and growth that was shared and exchanged through a combination of one-on-one meetings <u>with</u> and data submissions <u>from with</u> local jurisdictions.”
18	Clarification	p. 5; bullet 5	“Did the MPO/RTPA who has federal lands within its jurisdictional boundary involve the federal land management agencies during the preparation of the RTP? (23 CFR 450.316(d))” <ul style="list-style-type: none"> Define RTPA
19	Revision	P.6, paragraph 2	In the second paragraph, revise the first sentence to include the following language: Under SB 375, SCAG’s role is to coordinate the development of the Connect SoCal 2024 land use pattern in partnership with local jurisdictions that are ultimately responsible for implementing it, <u>where applicable and feasible.</u>
20	Clarification	p. 6; paragraph 4; sentence 1	“Put simply, the emphasis of RHNA in the 6th ^{sixth} cycle expanded to a more comprehensive assessment of the need for housing: <u>explicitly addressing</u> the existing need plus the need to house anticipated population growth. In prior cycles it focused on need due to anticipated population growth, <u>which addressed existing need through adjusting future households.</u> ”
21	Clarification	p. 6; paragraph 5; sentence 2	“Some local updates are not due to HCD until October 2024 and at the time of the LDX conclusion <u>in December 2022</u> , only 84 of 197 jurisdictions had an adopted and certified housing element.” <ul style="list-style-type: none"> Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic.
22	Clarification	p. 10; paragraph 2; sentence 1-2	“In the early twenty-first century, expansion on the urban fringe has continued in some places, though the region’s fragile and rugged natural landscape—as well as sheer distances—present substantial limits. As a result, there has been an increase in infill development and a higher share of new housing consisting of multifamily units in existing communities since the Great Recession, <u>due in part to less available land to build on.</u> ”



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			<ul style="list-style-type: none"> Remove “fragile” or expand on what this means
23	Clarification	p. 10; paragraph 6; last line	<p>“From 2012 to 2019, new development throughout the region resulted in the amount of natural lands decreasing by roughly 50,000 acres, or 0.2 percent. Household and employment growth that degrades or develops vital habitats reduces the environmental services they provide us that are crucial to our regional economy, health, and overall quality of life.”</p> <ul style="list-style-type: none"> Define ‘natural lands’ and provide source Define ‘vital habitats’ and provide source
24	Clarification	p. 11; paragraph 2; sentence 2	<p>“From 2012 to 2018, however, new development in areas with longstanding agricultural resulted in farmland decreasing in Southern California by more than 40,000 acres, or 3.5 percent.”</p> <ul style="list-style-type: none"> Was this land all zoned as agriculture or was it zoned for another use and temporarily used as agriculture? There are portions of the region where land is zoned for residential or commercial and temporarily being used as agriculture. Conversion of some agriculture land may also be due to rezoning to accommodate RHNA allocations.
25	Clarification	p. 11; paragraph 3; sentence 2	<p>“Additionally, development on natural and farmlands often occurs away from <u>existing</u> jobs, schools, retail, health care, and high-quality transit service, leading residents to drive longer distances to access key destinations.”</p>
26	Clarification	p. 12; map 1	<ul style="list-style-type: none"> Map has poor resolution Define ‘Protected Open Space Areas’ on the map page Why are there several different data sources with different dates layered on top of one another?
27	Clarification	p. 15; paragraph 3; sentence 2	<p>“As a result, <u>the most reasonable utilization and, where appropriate,</u> conservation of natural and farmlands is an important strategy to support SB 375 objectives. ”</p>
28	Clarification	p. 15; paragraph 5	<p>“Broadly speaking, growing sustainably requires growing <u>partly</u> in places and ways that achieve substantial housing growth within complete communities while <u>reasonably managing</u> minimizing growth at the urban fringe <u>and beyond</u>. <u>To a degree,</u> housing of various types can be located in areas that <u>which</u> promote location efficiency, good accessibility, and do not <u>result in the utilization of</u> risk natural lands or risk environmental hazards.”</p>
29	Clarification	p. 18; table	<p>“Stressors: Chronic challenges that weaken natural, built, or human resources...</p> <ul style="list-style-type: none"> Car-less Households” <ul style="list-style-type: none"> Why is ‘car-less household’ a stressor? Aren’t car-less households encouraged by State to reduce ghg? What if the lack of automobile is a purposeful choice?
30	Clarification	p. 19; paragraph 2; last sentence	<p>“SB 375 requires that Connect SoCal 2024 contain a Forecasted Regional Development Pattern (FRDP) —a growth vision—that can be shown to achieve GHG emissions reductions targets when combined with transportation network data and additional Plan strategies. The Connect SoCal 2024 growth visioning process integrated sustainability considerations into a preliminary development pattern. This was then</p>



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			shared with local jurisdictions through the Local Data Exchange (LDX) process, which is described more comprehensively in Section 5.5, for review and feedback and became the FRDP. This is a departure from previous plans where local review occurred much earlier in the plan development process, and jurisdictions could only provide public comment about the growth forecast after SCAG’s visioning process and alternate growth forecasts were developed.”
31	Clarification	p. 19; paragraph 4; sentence 1	“The Regional Growth Forecast, described in detail in the Demographics and Growth Forecast Technical Report, is <u>the</u> starting point for the Connect SoCal 2024 growth vision.”
32	Clarification	p. 21; map 2	Add note specifying land use categories were standardized by SCAG.
33	Clarification	p. 23; paragraph 1	“The latest jurisdictional existing land use, general plan land use, and other data serve as the basis for future year population and household allocation in that they reflect supply. These measures of remaining capacity are matched with county and regional growth—demand—using growth—demand—using a mathematical approach. As such, the projection does not reflect a build-out scenario. Combining the general plan, existing land use, and 2020 Census data above indicate that in the aggregate, local plans in the SCAG region currently have a theoretical physical capacity of roughly 8.2 million housing units—several times higher than anticipated household growth. <u>However, for these additional units to be realized, oftentimes the existing structures would have to be demolished and replaced with higher density developments.</u> Using this capacity as a starting point, the Regional Growth Vision:”
34	Clarification	p. 23; bullet 3; sentence 4	“Edits received on growth are often reflective of local general plans, local growth policies, <u>entitled and approved projects</u> , historic preservation, anticipated job growth, amongst several other factors.”
35	Clarification	p. 28; second bullet	“ Implement <u>Promote</u> the Forecasted Regional Development Pattern of Connect SoCal 2024, consisting of household and employment projections that have been reviewed and refined by jurisdictions and stakeholders to advance this shared framework for regional growth management planning...”
36	Clarification	p. 29; paragraph 3	“This data was mapped and functioned as a key informational resource during local review along with the PDAs. As a result of this process, growth in overlapping GRRAs has been de-emphasized but not completely eliminated in eliminated. <u>eliminated</u> in the Connect SoCal 2024 forecasted development pattern. <u>pattern.</u> ”
37	Clarification	p. 29; paragraph 5; sentences 3-4	“CoSMoS is an online mapping viewer that makes detailed predictions over large geographic scales of storm-induced coastal flooding and erosion for both current sea level rise (SLR) scenarios. The data included in this <u>technical report book</u> depicts the potential inundation of coastal areas resulting” <ul style="list-style-type: none"> • What are the “both” scenarios?
38	Clarification	p. 34; paragraph 3; sentence 2	“Local jurisdictions were then engaged for review and feedback that was then incorporated <u>integrated</u> to best reflect local plans and conditions.”
39	Clarification	p. 35; Map 6	Explain what is being shown or add a note referring the reader to the specific section that explains the map



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40	Correction	p. 36; paragraph 1; sentence 4	<p>“132 local jurisdictions provided input on SCAG’s draft growth forecast, while 148 percent provided input on other data elements such as GIS maps or surveys.”</p> <ul style="list-style-type: none"> • Correct the 148 percent
41	Clarification	p. 37;	<p>“Data– For the one question assessing data collected by local jurisdictions, the most common are: Local road pavement management and performance data (52 jurisdictions), Collision data (51 jurisdictions) and Pavement Condition Index (49 jurisdictions).”</p> <ul style="list-style-type: none"> • Please clarify
42	Clarification	p. 37; paragraph 1	<p>“To ensure that the local edits to the development pattern appeared on-track to reach SCS objectives, SCAG conducted a sketch-planning evaluation with the assistance of the Technical Working Group (TWG), <u>which this occurred prior to development of subsequent Connect SoCal 2024 strategies and modeling²⁶. modeling²⁶</u>. According to this evaluation, the FRDP has slightly less growth in the most prioritized areas (<u>steps 1-3 representing areas with more than one PDA and no GRRAs</u>) than the preliminary projection (steps 1-3 representing areas with more than one PDA and no GRRAs); however, its performance exceeded that of the final, adopted Connect SoCal 2020. Similarly, the share of growth in <u>areas with no more than one GRRAs</u> increased from 88 percent to 90 percent compared to the prior plan (Figure 1).”</p>
43	Clarification	p. 37; Figure 1	<p>Add note under figure with definitions of acronyms as figures can be pulled out as standalone items. Change title or add note explaining more about what the figure represents.</p>
44	Clarification	p. 37; Figure 1	<p>“On April 20, 2023, the TWG discussed the FRDP and along with staff <u>and it</u> was determined to be sufficiently able to further the plan’s statutory objective to proceed with subsequent modeling and regional policy development.”</p>
45	Clarification	p. 38; Map 7	<p>“Source: SCAG 2023. Priority areas refer to <u>an area with</u> more than one PDA and no GRRAs. Resource areas refer to two or more GRRAs.</p> <p>Add language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”</p>
46	Clarification	p. 39; paragraph 1; last sentence	<p>“In addition, the region will <u>can</u> grow sustainably by incorporating climate resilience <u>strategies</u> and <u>promoting and reasonably pursuing</u> natural and farmland conservation, and broad complete communities strategies, including the concept of 15-minute communities.”</p>



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47	Clarification	p. 43; paragraph 1 under Natural and Farmland Preservation)	"Preserving <u>and most reasonably utilizing</u> the region's natural and farmlands will ensure that future generations will be able to enjoy Southern California's unique landscapes as we do, and benefit from the essential resources that natural lands provide."
48	Clarification	p. 44; paragraph 3	"Connect SoCal anticipates <u>and projects</u> that some of the existing natural and farmlands in the region will convert to urban uses as the region grows to accommodate 1.6 million additional households."
49	Clarification	p. 44; paragraph 5	"For natural lands, 48,590 acres are anticipated <u>and projected</u> to be converted to urban uses by 2050 from existing conditions. This represents 617 acres more than the Trend/Baseline and is consistent with jurisdictional feedback on locally anticipated growth. With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 18,032 acres of degraded habitat - 1,202 acres more than the Trend/Baseline. Some areas are improved, however, as Connect SoCal will result in <u>a projected</u> 1,891 acres of improved habitat - 666 acres more than the Trend/Baseline."
50	Clarification	p. 44; paragraph 6	"For agricultural areas, specifically, implementation of Connect SoCal <u>would</u> will result in <u>the projected</u> conversion of 8,156 acres to urban uses - a <u>projected</u> loss of an additional 1,464 acres of farmland over the Trend/Baseline. There are <u>would be</u> economic impacts due to this projected loss of farmland, where agricultural production value is anticipated to decline by roughly \$9 million through year 2050 compared to the Trend/Baseline. With this <u>Plan's projected</u> loss of both natural and farmlands, groundwater recharge is anticipated to decline by 129,326 acre-feet - 24,862 more acre-feet than the Trend/Baseline scenario."
51	Clarification	p. 46	Asterisks are used in the bulleted lists but are not explained. Please explain.
52	Clarification	p. 47; paragraph 2	"Tax increment financing which includes but is not limited to Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), Neighborhood Infill Finance and Transit Improvements Districts (NIFTIs), and Affordable Housing Authorities (AHAs) is a tool that can allow local jurisdictions and public agencies to collaborate on achieving infrastructure, mobility, economic development, sustainability, and housing goals by leveraging tax increment (captures generated property tax as a result of invested dollars) to fund multifamily affordable housing, transit/rail capital projects, Transit-Oriented Development, Complete Streets capital projects, parking, parks and open space, and programs to reduce GHG emissions and VMT within TPAs. SCAG has supported <u>the establishment</u> of several EIFD districts in the SCAG region through funding and technical assistance programs." <ul style="list-style-type: none"> • Sentence 1 is a very long sentence. Try to break up if possible.
53	Clarification	p. 50; last bullet	" <u>Support the development of</u> Develop housing in areas with existing and planned infrastructure, availability of multimodal options, and where a critical mass of activity can promote location efficiency.
54	Clarification	p. 51	What is the reduction in GHG? This should be called out
55	Clarification	p. 51; bullet 2	"Improved pedestrian infrastructure - Pedestrian oriented design can create a more accessible and connected environment to key destinations and activity centers, increase transit ridership, and reduce the number of single-occupant trips. Continuous and cohesive sidewalk networks improve



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			the safety and comfort of streets, enabling people of all ages and abilities to get where they want to go. Improving walkability often means <u>installing</u> implementing new sidewalks, improving the quality of existing sidewalks and including street trees and other amenities.”
56	Clarification	p. 51; bullet 3	<p>“Co-working ...This strategy was developed using a very conservative assumption that a small portion of long-distance commuters would substitute a single day per week of their commute for a co-working site within three miles of their home.”</p> <ul style="list-style-type: none"> • Are these co-working sites new? Informal? Is there some sort of inventory of these now? Are more expected/planned?
57	Clarification	p. 58; bullet list	What are LDCs?
58	Clarification	p. 58	<p>Add new section: “7.5 TAZ-Level Growth Forecast, Growth Vision, and SCS Consistency In order to assess the ability of the Connect SoCal 2024 Plan to meet federal air quality standards and achieve a state greenhouse gas reduction target, SCAG creates small-area projections data for housing, population, and employment, which are known as the Tier 2 traffic analysis zone (TAZ) socioeconomic dataset (SED). Although these data are based in part on input provided by staff from local jurisdictions during the Connect SoCal 2024 Local Data Exchange process, local jurisdictions and projects within the region shall not be held to meet any specific numbers within or aggregates of the TAZ data. Connect SoCal 2024’s TAZ-level household and employment projections are created to provide estimated snapshots in time. These projections do not reflect subsequently available information (given that local jurisdictions provided their local input to SCAG between May and December 2022); and, concerning some jurisdictions, they also do not reflect all currently entitled and pending projects. Additionally, the TAZ data do not project the full build-out and realization of localities’ general plans; and they do not conform to jurisdictions’ current respective housing elements. The local plans and approvals have continued and will continue to evolve; and market forces will continue to play a major role in determining the timing, locations, and different types of development and redevelopment that will occur. Therefore, the applicable jurisdiction(s) should be contacted for the most up-to-date data available.</p> <p>The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.</p> <p>SCAG’s forecasted regional development pattern (FRDP) is not solely based on the TAZ-level household and employment spatial projections. It is utilized to estimate the overall effect of the many policies, goals, and</p>



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<p>strategies of Connect SoCal—which should not be uncritically applied, individually or en masse, to any particular project or plan. The TAZ-level household and employment growth projections support the region’s ability to model conformity with federal air quality standards and its ability to achieve a state greenhouse gas reduction target; they do not, however, reflect the only set of growth assumptions that may meet these standards and that target.</p> <p>Therefore, insofar as housing and other laws or grants may require comparisons of projects or plans to Connect SoCal 2024, SCAG’s projections that are illustrated in TAZ maps—along with any related documents or modeling outputs—may not be used to determine the inconsistency of any plan or project in the region with Connect SoCal 2024. Given that land use decisions are properly made with attention to local contexts and circumstances, local jurisdictions and other lead agencies shall have the sole discretion to determine a local project’s or plan’s general consistency and overall alignment with Connect SoCal.</p> <p>For example, local jurisdictions’ plans and approvals may be found to align with Connect SoCal 2024 if they directionally support a number of its objectives, such as by encouraging a mix of housing types that includes more affordable and multi-family housing rather than solely single-family, for-sale housing; providing for more housing located proximate to employment or vice versa; or encouraging increased use of transit, ridesharing, biking, walking or micro-mobility, or hybrid and remote work to reduce commuting trips. Such alignment is an appropriate basis for a local jurisdiction to determine that a plan or project is consistent with Connect SoCal 2024. Such determinations should be evaluated based on (i) the totality of the goals, policies, and objectives of Connect SoCal 2024 and its associated Program Environmental Impact Report (PEIR), and (ii) the attributes of the local project or plan in overall relation to Connect SoCal, and not in a prescriptive manner by applying SCAG’s TAZ-level data, any aggregate thereof, or any particular one or more goals, policies, or objectives of Connect SoCal 2024 and its associated PEIR.</p> <p>This flows logically from the fact that Connect SoCal 2024 includes dozens of stated directives, policies, goals, objectives, and measurements, any number of which may not be individually applicable to any given project or plan. For example, a project that provides new housing units in conformity with a jurisdiction’s approved housing element can and should be found to be in overall alignment with Connect SoCal 2024 given housing production’s contribution to Connect SoCal 2024 goals and policies, especially those related to affirmatively furthering fair housing, social and economic justice, jobs-housing balance, and the like.</p> <p>Household or employment growth included in the Connect SoCal 2024 TAZ-level SED and maps may assist in determining consistency with the SCS for purposes of determining a project’s eligibility for CEQA streamlining under</p>



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			SB 375 (Cal. Govt. Code § 21155(a)). TAZ-level maps and data may not otherwise be used or applied prescriptively to determine that a project is inconsistent or not in alignment with Connect SoCal 2024 for any purpose, given that myriad other development assumptions could also be found to be consistent or, on balance, aligned with the SCS. Specifically, the TAZ-level data and maps do not supersede or otherwise affect locally approved housing elements, including those adopted in compliance with the 6th Cycle of the Regional Housing Needs Assessment (RHNA)."
59	Clarification	p. 59	SCAG should explain on this page how we are meeting the GHG reduction targets. Supply the metric associated with Land Use
60	Clarification	p. 61; endnote	<p>"25-At the time of the release of the initial growth preliminary development (April May 2022), only 12 of the region's 197 jurisdictions had 6th cycle housing elements which that had been adopted and certified by the state. While local jurisdictions were requested to consider housing element updates in their review of LDX growth data, only 87 had adopted and certified housing elements even by the January 2023, immediately after the deadline for LDX input. Additionally, some local jurisdictions may not be required to complete rezonings associated with housing element updates until October 2024, rendering data on newly available sites inherently incomplete (or unavailable) for the purposes of Connect SoCal 2024.</p> <ul style="list-style-type: none"> Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic.

Table 11. MOBILITY TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add "2024" to all technical report page headers' titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	General Comment	All pages	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	4.3.2: Existing Transportation System: Local Streets and Roads	p. 205	Please clarify if the definition and discussion on local streets and roads pertains only to public local streets and roads, or if it also includes privately-owned streets. With the discussion on maintenance needs and funding sources, it appears that the discussion pertains to only public local streets and roads, and the reference to "public" is recommended to be included in the narrative.
9	4.6.1: Declining Infrastructure	Figure 4-4, p. 211	Figure 4.4: 2022 Bridge Conditions in the SCAG Region, is missing an information label for the "Y" axis. What do these numbers on bridge condition for each of the six SCAG counties represent?
10	4.6.2: Congestion and Delay: Daily Person Hours of Delay	p. 212, 213; Figure 4-6	The narrative discussing person hours of delay by facility type (page 212, last paragraph) does not match with the information presented in the corresponding Figure 4-6 on page 213. Please re-check the percentages called out in the narrative, against the calculation of percentages with the data in Figure 4-6 on daily person-hours of delay between Base Line (2050) and the Plan (2050). "Connect SoCal 2024 plan investments are estimated to decrease daily person-hours of delay of 17 percent overall, highway and 21.7 percent on highways and 8 percent on arterials compared to Base Year <u>Baseline</u> conditions." Or "Connect SoCal 2024 plan investments are estimated to decrease daily person-hours of delay of 20 <u>17</u> percent overall, highway and <u>19.2</u> 21.7 percent on highways and 17.8 <u>8</u> percent on arterials compared to Baseline conditions."
11	4.6.2: Congestion and Delay: Truck Delay by Facility Type	p. 213, 214 Figure 4-7	The narrative discussing average daily truck delay by facility type (page 213, last paragraph) does not match with the information presented in the corresponding Figure 4-7 on page 214. Please re-check the percentages called out in the narrative, against the calculation of percentages with the data in Figure 4-7 on truck delay <u>by facility type</u> , between Base Line (2050) and the Plan (2050). "Connect SoCal 2024 is estimated to reduce truck delay by 19 percent over Baseline conditions for the category of highway/expressway, with 13.8 <u>18.1</u> percent over Baseline conditions for the arterials <u>and 18.1 percent overall.</u> "
12	4.6.6: Speed Management	p. 217	The last paragraph of this section discusses AB 645's pilot program for speed management. Since several SCAG local jurisdictions will be participating in the pilot program, a call-out of the participating jurisdictions is recommended.
13	4.9.3: Performance Measure 2: Pavement and Bridge	p. 228, 229 Figure 4-10: State Figure 4-11: SCAG	The narrative on page 228 discusses the pavement conditions of the State and SCAG region, for roads and bridges. Noting that most of the pavement condition falls within the Fair category, is there a reason why Figure 4-10 and Figure 4-11 do not display any information on the Fair Category, and only focus on the Good and Poor pavement and bridge conditions?
14	4.10: Where Do We Go From Here?	p. 233, 235	The first full paragraph on page 233 states that "...the cost of rebuilding roadways <u>pavement</u> could be 14 times more than preventive maintenance."



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
	4.10.4 Smart Cities		<p>Later, on page 236, third bullet, the technical report states that "The cost of rebuilding roadways <u>pavement</u> is exceptionally more (up to eight times more) than preventative maintenance."</p> <p>Please re-examine the differing percentages, and reconcile.</p>

Table 12. PERFORMANCE MONITORING TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add "2024" to all technical report page headers' titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	General Comment	All pages	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
8	Clarification	p. 2; paragraph 1 Section 1.2: Connect SoCal 2024 Performance Summary	<p>"The plan performance assessment demonstrates that implementation of Connect SoCal 2024 will propel the region toward achievement of the identified goals for <i>nearly</i> every identified plan performance measure."</p> <p>Please add narrative in the above paragraph or use another technique such as the use of asterisks within Table 1 (Connect SoCal 2024 Performance Assessment Results), to identify which performance measures do <u>not</u> achieve identified goals. This will greatly assist the reader from having to go through each of the performance measures in Table 1 to arrive at the answer.</p>
9	Clarification	p. 3 Average trip distance (all modes)	<p>Table 1: Connect SoCal 2024 Performance Assessment Results</p> <p>In the Average trip distance (all modes) performance measure, is "miles" the measure that is used for the average trip distance shown in the reporting years? If so, please add the reference to "miles" in the appropriate table columns for this measure.</p>
10	Clarification	p. 6	Clarification is requested on the identification of "Savings" and "Change" for the Benefit Category of "Share of Population Living in PDAs".



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
		Share of Population Living in PDAs Table 2: Connect SoCal 2024 Co-Benefits	The Savings is identified as a 3.3% higher share of population living in PDAs, when comparing Connect SoCal to the Baseline. However, on the "Change" column, the entry is "+3.3 pct pts". Is that not the same as saying +3.3%?
11	Clarification	p. 17, p. 72 ADU Development Table 6: Connect SoCal 2024 On-Going Monitoring Performance Measures	In Table 6, this ADU-related performance measure is described as "Number of ADU units <i>developed</i> within Priority Development Areas (PDAs)." Further, within the page 72 narrative on this performance measure, the text states that "This new metric will track the number of ADUs <i>developed</i> in each county within the SCAG region over the Connect SoCal 2024 plan horizon." If this is to be a tracking measure, SCAG should clearly define what it is that would be tracked and use that descriptor in Table 6 and in the narrative on page 72. For example, is the tracking measure to be ADU approvals? Building permits? Building finals?
12	Clarification	p. 17, p. 75 Urban Heat Island Reduction Strategies Table 6:	In Table 6, there is an "Urban Heat Island Reduction Strategies" performance measure. The description provided in Table 6 and further discussed on page 75 identifies that the strategy is based on the implementation of urban tree canopy. How will this data be captured by SCAG, to be able to report on progress of this performance measure? Is there a specific data source(s) that would be used, or is this to be based on information from local governments in the SCAG region? Please clarify.
13	Correction	p. 45	Repetitive language "Priority Development Areas (PDAs) are areas that offer high levels of accessibility and connectivity to job centers and other primary destinations and opportunities that offer high levels of accessibility and connectivity to job centers and other primary destinations and opportunities."
14	Clarification	p. 69	The housing crisis not just in California or SCAG region. Change to "Due to the housing crisis, <u>which is not limited to just in Southern California or the SCAG region...</u> "
15	Clarification	p. 87	The analysis for the increase in bicycle-related serious injuries and fatalities should consider and discuss the increased use of e-bikes, especially the increased use of e-bikes by people of a younger age and less decision-making skills. This may be evidenced by looking at the age of the injured/killed and referencing recent attempts at licensing in state legislation. In addition to Connect SoCal 2024 serving "as a catalyst toward improved regional bicycle safety performance", can it (or SCAG) also serve as a catalyst for bicycle safety education and/or licensing?
16	Clarification	p. 113-114 Section 7.4.3	The narrative states that "A new performance measure was proposed for inclusion in the PM 3 program that will require the monitoring and reporting of surface transportation-related GHG emissions reductions." The narrative further states that "the proposed new GHG emissions reduction performance measure would require Caltrans to establish two- and four-



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
		GHG Emissions Reduction Measure	<p>year statewide targets, while SCAG would establish four-year regional targets for reducing tailpipe CO2 emissions on the NHS."</p> <p>The narrative further states that final FHWA rulemaking is expected in November 2023.</p> <p>At present, is it correct to state that:</p> <p>a) the current inventory of performance measures presented in this Technical Report does not include this new federal GHG performance measure;</p> <p>b) the GHG Emissions performance measure listed in Table 4: Connect SoCal 2024 Plan Performance Assessment Measures (page 11), is the California Air Resources Board's GHG emissions reduction target for the SCAG region; and,</p> <p>c) the new federal GHG emissions reduction target could possibly be added to this Technical Report as a new performance measure, if the federal Rulemaking is accomplished in time?</p>

Table 13. PROJECT LIST TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add "2024" to all technical report page headers' titles
2	Correction	All Pages 2-430	Change "\$1000's" to "\$1,000s"
3	Correction	p. 100; Table 1	Table 1, Row 9, ORA111207, Project cost should be \$423,000 (per FTIP amendment #23-11)
4	Correction	p. 257	RTP ID 2T01135, Lead Agency should be "Various Agencies" and Project Cost should be \$423,000

Table 14. PUBLIC PARTICIPATION AND CONSULTATION TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add "2024" to all technical report page headers' titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.



#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 10; Section 9.1. Survey Findings, first sentence	Clarify if respondents had the opportunity to take the survey more than once. If so, did the 3,683 “completed surveys” actually come from 3,683 respondents? If not, that should be mentioned in the paragraph.
7	Clarification	p. 10; Figure 1. Survey Responses by County	Figure 1 shows that 50% of the survey respondents came from the County of LA. As such, the response are skewed and more LA-centric, which should be noted somewhere in this technical report when discussing survey results.

Table 15. TRANSPORTATION CONFORMITY ANALYSIS TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add “2024” to all technical report page headers’ titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
8	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”
9	Correction	p. 23 & 41 (2 occurrences)	“2020 Decennial Census PL-94 171 Redistricting File” Change to “2020 Decennial Census P.L. 94-171 Redistricting File”

Table 16. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add “2024” to all technical report page headers’ titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g.,



#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	Clarification	p. 1, first paragraph	"However, the IJJA expires in Fiscal Year (FY).." – specify it is "Federal" fiscal year.
8	Clarification	p. 1; 1. Introduction: Revenue sources	Page 1, third paragraph, states that "Efforts are underway to explore how we can transition from our current system based on fuel taxes towards a more direct system of user fees." This sentence seems to downplay/contradict a preceding sentence which recognizes that local sales tax revenues for transportation purposes generate 58% of the region's core revenues, and highway tolls an additional 8%, according to Figure 6, page 10. Perhaps revise the reference of "based on" to a more appropriate reference.
9	Clarification	p. 2 1. Introduction: Equity Considerations of User Rees	Page 2, first full paragraph, states that "SCAG further considers the potential equity concerns that accompany user fee policies and assumes mitigation measures such as the establishment of a mobility equity fund." Please clarify; in reviewing the mitigation measures in the Draft Program EIR, there does not seem to be any mitigation measure that addresses the equity considerations associated with any user-fee system of revenues (See PMM-TRA-2). Please also see related comments that are provided on the Draft Plan Equity Technical Report.
10	Clarification	P. 7, Sec 2.6 P. 9, Table 1 P. 16, Table 3.1 Core Revenues - Local	Section 2.6 acknowledged that local sales taxes for three counties will expire during the term of the Plan, including Orange County's Measure M in 2041. However, the core revenue forecast shown in Table 1 show a significant increase in funding in OC for the period of FY2045-2050 (\$25.1 billions in FY2045-2050 compared to \$18.3 billions in FY 2040-2044 and \$17.6 billions in FY2035-2039. Recommend providing clarifying information on the disproportionate increase and local sales taxes assumptions beyond their expiration. If a continuation of existing sales tax revenue (or other new taxes) is assumed through FY2045-2050, recommend categorizing this revenue under new reasonably available revenues to better illustrate the need to secure future funding.
11	General comment	p. 8, Appendix 1, p. 3	Core and Reasonably Available Revenues, identify federal, state and local sources of transportation funding for the plan and Highway Tolls identify toll road revenues and mitigation fees. Nowhere in the document is the private sector funding contribution assumed for the plan described, although toll road widenings, and tolled express lane facilities that are privately funded are included in the plan and in the total cost of the plan. Accurately describing the extent of private funding is an important public



#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			disclosure, and an important element of the financial plan that relieves the burden on limited federal, state and local transportation funding.
12	Clarification	p. 11 & 12; Figure 8 3.1: Core Revenues Federal	The narrative on Federal sources of core revenues on page 11 states that FTA Formula and Discretionary funds cumulatively account for 61% of the federal funding for the SCAG region. Please confirm. In reviewing the referenced Figure 8, the sum of the two funds appears to be 58%.
13	Clarification	p. 12, 13 Tables 2-4 Table 3.4 3.2: New Reasonably Available Revenues: Mileage-Based User Fee (Replacement) vs Local Road Charge Program	a) This section of the technical report should include a figure, similar to Figures 1 through 8, that visually identify the amount of new revenue and the associated percentage of the total new revenues, that are being assumed and listed in Tables 2 - 4. And that per Figure 12 on page 33, new revenues represent \$162.2 million or 22% of the Connect SoCal 2024 total revenues of \$750 billion. b) The narrative discussion on New Reasonably Available Revenues on page 13 could also warrant more clarifying explanation about the distinction between the Mileage-based User Fee (Replacement) and the Local Road Charge Program. Technically, both are mileage-based fee programs: summarize the distinctions that are discussed in Tables 2 and 4, to assist the reader who is not going to delve into the detail of those tables, yet recognizing that both fees could be imposed on the driver starting in 2035. c) Table 4 includes a risk assessment of the proposed new sources of funding. The information in Table 4 should be referenced in the narrative discussion on page 13, to inform the reader of the potential risk analysis that was conducted for each new funding source and the risk mitigation measures identified.
14	Clarification	P. 14-15, Table 2	While the number is available later in the report, Table 2 should include the total sum of new reasonably available revenue.
15	Clarification	p. 26 4. Expenditures	a) Page 26 of this section references a Figure 11 that represents the standardized template that the CTCs used to submit cost information for capital projects. Is it Figure 11 on page 32, or Figure 9 on page 26, that represents the standardized CTC template? b) Page 26 of this section references a Figure 12 to illustrate changes in California highway construction costs. Is it Figure 12 on page 33 or Figure 10 on page 21, that represents the change in California construction costs?
16	Clarification	P. 28, Table 5 P. 31, Table 6 Expenditure	Both Table 5 and Table 6 refer to service expansion. Recommend adding language that differentiates what is included in each table. For example, specify infrastructure and equipment required for service expansion in Table 5. Also clarify if operating costs are included in Table 6 as the text description before it only suggests system preservation and maintenance needs.
17	Correction	p. 29	Table 5, Highways, Add toll roads to HOV/Express Lanes/ Toll Roads . This change should also be made elsewhere in the main RTP/SCS document where highways and express lanes are discussed. Revise Description to include auxiliary lanes, general purpose lanes, carpool lanes, toll roads, toll lanes, and Express/HOT lanes.
18	Clarification	p. 30, 31	This section, second paragraph, outlines different factors that impact/damage roadways. One issue that has surfaced at SCAG policy



#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		4.3 MultiModal System Preservation and Maintenance	committee meetings but which is not addressed herein, is the impact of EV vehicle weight on roadway pavement conditions. Please identify if this is a valid issue that merits discussion as a potential contributing factor to pavement distress during the 20+ year of the Plan.
19	Clarification	p. 30-31, Section 4.3 Multimodal System O&M	Descriptions in this section mainly focus on street preservation and only touch lightly on preservation of transit assets. The funding need for transit, however, is at least twice that of streets and roads. Suggest adding descriptions of existing transit needs (e.g. there are X number of buses and rail cars in our region that must be maintained in good working order as well as X miles of track infrastructure).
20	Clarification	p. 31, last paragraph	"... maintain exiting transit" should be "existing".
21	Clarification	p. 34-35, Table 7 Revenues	There is a significant increase in revenues between the 2040-44 and 2045-49 periods, greater than any other time period. The increase seems exaggerated and requires further verification and clarification. Is the disproportionate forecast due to inflationary increase?
22	Clarification	p. 7; Appendix 1, page 1 Local Option Sales Tax Measures	The overview of the local sales tax measures that are factored into the Local Core Revenue Sources, identifies that several county sales tax measures will expire during the forecast period of Connect SoCal 2024. Under the "Real Growth Rate" percentages by county in Appendix 1, would it be appropriate to further identify that this real growth rate is being applied up to the year of any applicable sales tax expiration? Also please note there is a duplicative sentence in the preceding paragraph, last sentence in Appendix 1.

TABLE 17. TRAVEL AND TOURISM TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Technical Report should consider highlighting/emphasizing opportunities for travel for bicycle/e-bicycle throughout (e.g. the need for bikeways, bicycle use to and from transportation stops/hubs and tourist destinations, the existing bicycle network).
2	General Comment	All pages	Add "2024" to all technical report page headers' titles
3	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
4	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.



#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Correction	p. 1, Section 1	To address the CFR directive for the “continuous, cooperative, and comprehensive...”
8	General Comment	p. 1, Section 2	Expand the description for Lake Arrowhead like on Page 7.
9	Correction	p. 2, Section 2.2	Contradicting sentences: “Moreover, due to the size of the region and variety of places to visit and things to do, much of the traveler spending is generated by people living within the region.” (1 st paragraph) “According to the Visit California 2021 Report, The Economic Impact of Travel, travel spending in the SCAG region totaled approximately \$46 billion, of which about \$41 billion was from people visiting from outside the region.” (2 nd paragraph) Reword to clarify statements.
10	Correction	p. 3, Section 2.3	“From 2019 to 2020, after the onset of the COVID-19 Pandemic pandemic, travel spending in the region went down by 50 percent.”
11	Correction	p. 8, Section 3.1.2	The title for the section includes Old Town Tustin but there is no example of Old Town Tustin in the list.
12	Correction	p. 10, Section 3.1.3	Three Eight of the 23 Cal State University campuses are in the SCAG region, Cal State Los Angeles, Cal State Long Beach, <u>Cal State Fullerton</u> , <u>Cal State Northridge</u> , <u>Cal State Dominguez Hills</u> , <u>Cal State Channel Islands</u> , <u>Cal State San Bernardino</u> , and Cal Poly Pomona. Why aren’t private universities included, such as Chapman, Pepperdine, University of La Verne, and Loyola Marymount?
13	Correction	p. 10	3.1.4 Theme Parks and Movie Studios should probably read <u>Movie Studios</u>
14	Correction	p. 12; Bullet point #2 Bullet point #3 Bullet point #4 Bullet point #6	“National Football League” should be The Rose Bowl has hosted the National Football League (<u>NFL</u>) Super Bowl five times,...over the years.” “The Coliseum has served as the home for the National Football League’s (NFL) NFL’s Rams and Raiders and is the current homefield home field for the USC Trojans.” “It is home of MLS Los Angeles FC and the National Women’s Soccer League’s (<u>NWSL</u>) Angel City FC.” “Opened in 1993 and formerly known as The Pond, the Honda Center is a an <u>multi-purpose</u> indoor arena located in Anaheim, CA.”
15	Correction	p. 19	“...there a various programs and projects...” should read “...there <u>are</u> various programs and projects...”
16	Correction	p. 23, Section 4.3	On the second paragraph it looks like there was supposed to be an image added, but it only shows [OBJ]
17	Correction	p. 24	3 rd bullet point, should “For the 2024 Coachella Music Festival...” read “For the 2023 Coachella Music Festival...”?
18	Correction	p. 25; Bullet point #1; first sentence	“The 2028 Summer Olympics...Metro and Caltrans, has developed a an LA 28 Games transportation plan.”



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

Orange County Council of Governments

info@occog.com

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
19	General Comment	p. 26, Section 5.1	The fourth sentence is almost a repeat of the first sentence. Please delete or reword.
20	Correction	p. 27	Change "city and county boarders" to "city and county borders "
21	Correction	p. 29	Last paragraph, correct to read as "California Coastal Commission"



AFFILIATED AGENCIES

Orange County
Transit District

Local Transportation
Authority

Service Authority for
Freeway Emergencies

Consolidated Transportation
Service Agency

Congestion Management
Agency

January 12, 2024

Ms. Karen Calderon
Southern California Association of Governments
900 Wilshire Blvd, Suite 1700
Los Angeles, CA 90017

Via email: ConnectSoCalPEIR@scag.ca.gov

Subject: Notice of Availability (NOA) for Draft Program Environmental Impact Report (PEIR) for Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy)

Dear Ms. Calderon:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Notice of Availability (NOA) for Draft Program Environmental Impact Report (PEIR) for Connect SoCal 2024. The following comments are provided for you regarding the PEIR:

- On page ES-21, Mitigation Measure SMM-AG-3, since the Regional Greenprint discussion is more complicated than most other mitigations, please consider simplifying the language to indicate that SCAG would support local jurisdictions and transportation agencies in developing advanced mitigation programs through data sharing and facilitating collaboration forums. TRANS 1-1
- On page ES-47, Mitigation Measure SMM-HGH-1, there is mention of collaborative actions between SCAG and the air pollution control districts to continue working with local jurisdictions to adopt greenhouse gas reduction plans. OCTA recommends specifying the entity responsible for adopting these plans and also clarify whether it is the responsibility of SCAG or the local jurisdictions. TRANS 1-2
- On page ES-60, Mitigation Measure SMM-LU-1, describes SCAG coordinating with local County Transportation Commissions, Caltrans, and other local jurisdictions when siting new facilities in residential areas. Please clarify which entities are responsible for siting the new facilities. It could be construed as SCAG is siting new facilities, but that was likely not the intent. TRANS 1-3
- On page ES-70, Mitigation Measure SMM-TRA-1, the passage seems to imply that SCAG will directly implement mobility improvements to reduce vehicle miles traveled (VMT) and mitigate impacts on circulation and access. Please revise to clarify that SCAG's role related to this measure is to facilitate collaborative forums and encourage use of transit, active transportation, and TRANS 1-4

Ms. Karen Calderon
January 12, 2024
Page 2

other mobility improvements that can help reduce VMT and mitigate impacts
on circulation and access. | TRANS 1-4
(cont.)

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net.

Sincerely,



Dan Phu
Manager, Environmental Programs

January 12, 2024

Letter TRANS 2

Southern California Association of Governments
Attn: Mr. Kome Ajise
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

SUBJECT: COMMENTS BY SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY ON THE DRAFT 2024-2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY (*CONNECT SOCIAL*) AND DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Dear Mr. Ajise:

The San Bernardino County Transportation Authority (SBCTA) appreciates the opportunity to provide comments on the Southern California Association of Governments' (SCAG's) draft 2024 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and draft Program Environmental Impact Report (PEIR). Both documents have been very professionally prepared, with substantial input over the last several years from County Transportation Commissions (CTCs), councils of governments (COGs), local jurisdictions, other transportation agencies, advocacy groups, and the public. We appreciate the working relationship we have had with SCAG to bring the 2024 RTP/SCS to this point in its development. We look forward to the Regional Council's approval of the RTP/SCS and receiving subsequent federal approval for the RTP and state approval for the SCS.

TRANS
2-1

Our comments can be classified into three general themes:

- A summary of SBCTA's transportation and sustainability activities over the last several years that support implementation of the 2020 RTP/SCS
- Overall perspectives on the 2024-2050 RTP/SCS
- Specific comments on the content of the draft RTP/SCS and PEIR.

SBCTA TRANSPORTATION AND SUSTAINABILITY INITIATIVES

As you are aware, SBCTA/SBCOG and our local partners (transit agencies and local jurisdictions) have made great strides in implementing projects and pursuing sustainability initiatives throughout San Bernardino County, consistent with prior cycles of the RTP/SCS. These activities represent important contributions to sustainability region wide, and we thought it would be appropriate to highlight some of these in our comment letter on the RTP/SCS.

In brief, the following are recent and ongoing sustainability initiatives of SBCTA:

- Transit investments – Since the adoption of the 2020 RTP/SCS, significant strides have been made on transit investments: the nine-mile Arrow rail system being put into revenue service in October 2022; initiation of construction on the Zero-Emission West Valley Connector Bus Rapid Transit (BRT) line, our second BRT line in the Valley; working with Brightline West and California Department of Transportation (Caltrans) to place high-speed rail in the median of I-15 from Apple Valley to Rancho Cucamonga and helping Brightline to secure funding; and working with all our transit agencies to bring transit service back to pre-pandemic levels.
- Zero-Emission (ZE) - Preparation of the ZE Bus Study Master Plan in 2020 and working with our transit agencies to incorporate ZE buses into their systems; working with industry to fund and implement two hydrogen fueling stations and one electric truck charging station on critical freight corridors to accelerate the transition to ZE trucks.
- Preparation of the Inland Empire Comprehensive Multimodal Corridor Plan in 2020, with an update in 2022, in collaboration with Riverside County Transportation Commission, Caltrans, and SCAG.
- Active transportation – we have delivered or are in the process of delivering significant bicycle/pedestrian projects and programs with the assistance of \$60 million in State Active Transportation Program grants; completed the countywide Points-of-Interest Pedestrian Plan in 2022; and completed the Comprehensive Pedestrian Sidewalk Inventory Plan in 2023.
- Expansion of the rideshare/vanpool program in San Bernardino County. There are approximately 270 vans in the program between those managed by the Victor Valley Transit Authority and SBCTA.
- Completion of the Regional Conservation Investment Strategy, pursuant to AB 2087 and acceptance by the California Department of Fish and Wildlife.
- Completion of the San Bernardino County Regional Greenhouse Gas (GHG) Reduction Plan in 2021 and GHG Reduction Plan Environmental Impact Report in 2023. This was an update to address the GHG reduction goals of SB 32.
- Initiation of the Inland Regional Energy Network in 2022 with Western Riverside COG and Coachella Valley Association of Governments.
- Preparation of the Inland Empire Regional Climate Adaptation Toolkit

The SBCTA Sustainability web page has additional information and can be accessed at: [Planning & Sustainability - SBCTA \(gosbcta.com\)](https://www.gosbcta.com/Planning&Sustainability).

OVERALL PERSPECTIVES ON THE 2024 RTP/SCS

SBCTA has some overall perspectives for how the RTP/SCS can be used to achieve the mobility, safety, and sustainability goals of the region in the coming years. These comments relate to our Countywide Transportation Plan (CTP) and the current update to the Long Range Multimodal Transportation Plan (LRMTP, to be finalized in 2024), along with perspectives on our multimodal transportation system and managed lane network, goods movement, transit service, transit oriented development (TOD), and reduction in GHGs and vehicle miles of travel (VMT).

SBCTA's CTP/LRMTP and Relationship to the 2024 RTP/SCS

The CTP outlines a path forward for a sustainable transportation future, laying out an achievable strategy for highway and transit facilities, TOD, air quality, GHG reduction, freight, airports, transportation demand management (TDM), active transportation, and funding. The CTP analyzes two future scenarios: a “baseline scenario” that assumes traditional revenue sources (generally consistent with what the RTP/SCS defines as “core revenues”) and an “aggressive scenario” (generally consistent with RTP/SCS “Plan” revenues, including the new reasonably available sources identified in the Plan). The projects and programs in the aggressive scenario of SBCTA’s updated CTP are consistent with the lists in SCAG’s RTP/SCS. SBCTA may provide SCAG with any technical corrections to the San Bernardino County portion of the RTP/SCS project list in a separate communication, pending discussions with our local jurisdictions, so that the changes can be incorporated into the final RTP/SCS project list, if necessary.

Need for a Balanced, Multimodal Transportation System

As noted above, SBCTA has a strong multimodal and ZE focus in our transportation programs, investing heavily in the transit system, TDM, and active transportation. At the same time, our residents and businesses remain extremely concerned about living up to the commitments in our Measure I half-cent sales tax. Much of the concern centers around the congestion on freeways, interchanges, and the regional arterial system. We have prioritized interchange improvements and are proceeding to deliver those improvements, having completed 13 major interchange projects in the last 15 years. We are under construction or nearing construction for ten additional interchanges and are working with local jurisdictions on strategic ramp improvements. Interstates 10 and Interstate 15 (I-10 and I-15) are being addressed largely through our managed lane strategy, as described in the next section. **In other words, we cannot afford to neglect highway improvements as we also aggressively pursue a sustainable future.**

We appreciate SCAG’s acknowledgement of the need for Bottleneck Relief, as stated on page 112 of the RTP/SCS: *“As part of Connect SoCal and SCAG’s comprehensive regional goods movement planning, bottleneck relief analysis and implementation strategy development has served to identify areas with the worst congestion and delay characteristics. Targeted regional investments will implement a menu of improvement strategies focused on freight corridors to improve the flow of people and goods.”* In other words, we appreciate that the RTP/SCS acknowledges that highway improvements are still necessary, even though most of the attention is being given to trip-reduction strategies, with the goal of reducing GHGs and VMT.

At the same time, it is important to acknowledge that each individual project should not be expected to reduce VMT. What is important is the impact of the overall strategy. In San Bernardino County, the RTP/SCS shows that VMT per capita is being reduced by 4% between 2019 and 2050 just with the “baseline” investment and by almost 11% with the “Plan” investment (see page 179). This represents billions of dollars of investment in regional transit and trip reduction measures over that time period and appears realistic for San Bernardino County to achieve. Some of the latest data on VMT compiled by SCAG (as reflected in the January 2024 Community, Economic, and Human Development Committee agenda), shows a VMT reduction of approximately 5-6%, from pre-pandemic to post-pandemic, attributed at least in part to the broad-based use of virtual

travel. While more aggressive VMT reduction goals have been identified in other statewide plans (e.g. 25% reduction in the California Air Resources Board Scoping Plan update), those numbers should be viewed as aspirational and cannot be defended with any credible analytics. SCAG's modeling for the RTP/SCS should be used as the authoritative source.

When it comes to specific projects in the RTP/SCS, some will reduce VMT and others will increase VMT, but the net effect will be a reduction in VMT per capita over time. SBCTA continues to contend that single projects should not be held to a VMT reduction target, and state/regional agencies should not impose that requirement at the project level. We will continue to work with Caltrans to come up with fair and reasonable ways of addressing VMT at some combination of the regional and project level, including a VMT Mitigation Bank concept to be pilot tested in San Bernardino County over the next two years in collaboration with SCAG.

It should be noted that the rate of population growth tends to outstrip the per capita VMT reductions that can be achieved. Therefore, expectations of VMT reduction need to be tempered based on what is realistic. This also means that, for mobile sources, the path to GHG reduction will largely fall on energy efficiency, technological innovations (including continued advancements in virtual travel), and more rapid turnover of vehicle fleets to zero-emission. The GHG analysis in the California Transportation Plan demonstrated that vehicle and fuels technology will be the primary way in which GHG reduction goals will need to be met. While VMT reduction is an appropriate goal, technology will be the principal path to long term GHG reduction. SBCTA looks forward to partnering with SCAG, the state, and the utility industry to pursue these opportunities, consistent with initiatives we have mentioned earlier, while doing what we can with VMT reduction. All parties need to recognize that no one-size-fits-all as far as the strategy for GHG and VMT reduction is concerned.

Regional Express/Managed Lane Network

As indicated in the RTP/SCS, SBCTA has two major express/managed lane initiatives: I-10 from the Los Angeles County line to Ford Street in Redlands, and I-15 from the Riverside County line, up the Cajon Pass and to the Victor Valley. These projects are not only multimodal projects for passengers, with pricing benefits for buses, vanpools, and 3+ carpools, but they will significantly improve freight mobility as well. Each project includes auxiliary lanes to improve truck operations and safety, and will take some of the auto travel out of the general purpose lanes.

It is noteworthy that the I-10/I-15 interchange, at the heart of Inland Empire logistics activity, is designated as the tenth most critical freight bottleneck in the United States (per the American Transportation Research Institute), and the I-10 and I-15 corridors represent the major gateway from/to Southern California to/from the rest of America. The express/managed lanes will also permit light duty (under 10,000 pounds) commercial traffic. Improvement of these corridors is a win-win for both multimodal passengers and freight, but will need to be staged over the duration of the RTP/SCS.

Goods Movement

As you know, San Bernardino County is a beneficiary of the logistics industry and is at the same time heavily impacted by it. SBCTA appreciates SCAG's analysis of bottlenecks in the RTP/SCS, especially the detailed analysis and explanation of the freight bottlenecks on Map 11 and pages 100 through 106 of the Goods Movement Technical Report. In fact, we would request that Map 2.1 on page 39 of the main RTP/SCS report be replaced by Map 11 on page 104 of the Goods Movement Technical Report. We make this suggestion for several reasons: 1) state policy has de-emphasized congestion from a person-movement standpoint, while recognizing the importance of congestion relief for freight; and 2) the freight bottleneck map provides a better representation at a regional level of the magnitude of the supply chain problems we are collectively trying to fix. The complete listing of bottlenecks does not need to be provided in the full report, but highlighting Map 11 and a basic explanation of the freight bottlenecks for context would be helpful in conveying the magnitude of the freight challenges we face on the highway system. Map 2.1 does not really accomplish that.

Aviation

Aviation receives very little mention in the main Connect SoCal report. Given the importance of aviation as a mode, we would suggest that SCAG add at least some of the background information from the Executive Summary of the Aviation and Airport Ground Access Technical Report. We appreciate that SCAG has drawn its airport passenger forecasts directly from the airport authority forecasts in this cycle of the RTP/SCS. We agree that the airport authorities are in the best position to make those assessments, in collaboration with the Federal Aviation Administration. Forecasts are presented in the Aviation Technical Report. Whether they need to be presented in the full report is a judgment call on the part of SCAG, but it is expected that there will be considerable interest in those forecasts. Ontario International Airport continues to be one of the fastest growing commercial airports in the United States, and San Bernardino International Airport has also begun to serve commercial passenger travel.

Greenhouse Gas (GHG) Reduction

The 2024 RTP/SCS demonstrates that the SB 375 GHG reduction targets for the region are met for 2035. SBCTA has been aggressively working on GHG reduction strategies and implementation within San Bernardino County through our Regional GHG Reduction Plan and the Climate Action Plans of our local jurisdictions. As highlighted earlier, we are being very proactive on sustainability and GHG reduction initiatives.

At the same time, it is important to recognize that we need a robust highway network to remain competitive from a logistics standpoint. A strong economy is required for both the private and public sectors to afford the technology needed to meet air quality standards and achieve the requisite GHG reductions. It should also be understood that a thriving economy in a growing county like San Bernardino can result in an increase in VMT. While we understand that reductions in VMT can be helpful to GHG reduction, there are limitations on the extent to which VMT can be reduced, as discussed previously.

Programmatic Environmental Impact Report (PEIR)

Regarding the PEIR, we appreciate the structure of the document and the mitigation measures. The mitigation measures encourage action, but do not put requirements on the CTCs or local jurisdictions beyond those already required by the State. It also acknowledges that project-level environmental studies will need to be conducted prior to the implementation of any specific project, which is why a lesser level of detail was provided in the PEIR. We have no further comments on the PEIR.

TRANS
2-2

As stated earlier, SBCTA appreciates all the efforts by the SCAG Regional Council and SCAG staff to make the 2024 RTP/SCS a reflection of where the region is headed over the next 26 years. We look forward to continuing partnerships with SCAG to implement the projects and programs in the RTP/SCS. Attachment 1 provides a few more specific comments or suggested edits to specific pages of the RTP/SCS.

TRANS
2-3

Sincerely,



Raymond W. Wolfe
Executive Director

cc: Steven Smith, SBCTA

ATTACHMENT 1.
SPECIFIC COMMENTS AND SUGGESTED EDITS ON THE 2024 RTP/SCS

Page 152 and following (Section 4.3) – In the discussion of core revenues, the importance of the local sales tax measures is highlighted several times. It is stated that “*These taxes account for more than half (58 percent) of local core revenue sources in the Plan.*” It is also noted that the current measures for Orange, Riverside, and San Bernardino Counties all sunset at about the same time, between 2039 and 2041. What is not clear is whether the core revenue forecast assumes extensions of the measures to provide revenue through the horizon year of 2050. It would appear the assumption is that the local sales tax revenue would continue through 2050, based on the county-level core revenue forecast in Table 4.2 on page 153, given that the revenue continues to increase in each of these three counties. But this is not explicitly stated. Please clarify.

Page 159, Table 4.3 – Please change the references to “Virgin Trains” to “Brightline West.” The references to Virgin Trains should also be changed in the several locations where they occur within the RTP/SCS Project List.

Page 159, Table 4.3 – Section 4.3 of the RTP/SCS notes that \$162 billion of the \$750 billion total revenue will be from “new reasonably available sources.” This represents about 22 percent of the total. Approximately 60% of the new revenue is shown to be from the Local Road Charge Program, as described on page 159. The program “*assumes a \$0.020 (in 2019 dollars) per mile charge throughout the region that can be implemented on a county basis.*” Based on Table 4.5.1 on page 170, the Local Road Charge Program is projected to be fully operational in all counties beginning in 2035. While the schedule for implementation provides 10 years of planning and preparation, SCAG will need to provide additional information subsequent to approval of the RTP/SCS regarding how the Local Road Charge Program is expected to work and what the responsibilities of the CTCs are expected to be.

Page 171, Table 4.5.2 – It is noted that transit operations and maintenance costs are expected to triple between the first five years of the plan and the last five years of the plan from \$26.3 billion (2025-2029) to \$81.8 billion (2045-2050). The operations and maintenance costs for passenger rail will increase by over five-fold. Transit/rail operations and maintenance is the largest single category of costs in the RTP/SCS, representing 39% of the RTP/SCS expenditures. While this increase in transit operations and maintenance costs includes the effect of inflation, it also includes significant increases in service, as well as transition to zero-emission bus fleets and rail technology, in the effort to achieve the California State Legislature’s goals of GHG and VMT reduction. It is critical that the transportation agencies in the SCAG region impress upon the legislature and Governor that the state must step up the plate to assist in the funding of transit operating and maintenance costs. The state has placed a great deal of emphasis on grant funding for capital expansion of transit systems. SBCTA has been very proactive in these investments for San Bernardino County. However, it is imprudent to build what we are unable to operate, and the state has an obligation to help local agencies in funding of the transit/rail operations and maintenance costs required to achieve the statewide goals. The state also needs to be proactive with the federal government to impress upon them the importance of increasing their funding share devoted to transit operations and maintenance.



City of El Segundo

Community Development Department

January 10, 2024

Southern California Association of Governments
Attn. Ms. Karen Calderon
900 Wilshire Blvd. Ste. 1700
Los Angeles, CA 90017

Via Email: connectsocialpeir@scag.ca.gov

On behalf of the City of El Segundo, California, please find the following comments on the Draft Program Environmental Impact Report (State Clearinghouse No. 2022100337) for the proposed 2024-2050 Regional Transportation Plan and Sustainable Communities Strategy, also referred to as "Connect SoCal 2024."

LOC 1-1

- The technical report must include an assessment of the number of lower capacity and slower speed aircraft that can be diverted from LAX to these other reliever airports, which in turn allows more flights with larger aircraft and passengers to LAX. Thus, how much more larger flights and how many more passengers are going to LAX as a result of diverting to reliever airports.

LOC 1-2

- According to the technical report, "the pending closures of several general aviation and reliever airports in the SCAG region, such as Santa Monica Airport, and potential closures of others, such as Whiteman Airport, could have a significant impact on the region."

LOC 1-3

- An assessment must be conducted of these impacts from closures and potential closures. The assessment must include the types of aircraft and flights that will be diverted, where they will be diverted to, and the forecasts adjusted accordingly.

- The technical report provides that Los Angeles Airport (LAX) will experience a near 50% increase in annual passengers over the next 30 years. The City contests this projection is unsubstantiated and provides significant impacts related to traffic, air quality, and noise.

LOC 1-4

- Greater emphasis of the forecast shall prioritize the distribution of this increase (approximately 42 million annual passengers) to the region.

- The Connect SoCal document identifies a "Planned Dual-Lane Segment" for the 105-Freeway (Map 3.2, Regional Express Lane Network, Page 95). The 1981 Consent Decree imposed conditions on the development of the freeway, including alterations to the design to reduce lanes. How is this planned dual-lane segment consistent with the decree?

LOC 1-5

- An analysis must be completed of the additional capacity to the 105-freeway resulting from the dual-lane on the 105-freeway.

LOC 1-6

- The increased capacity will impact air quality to communities along the 105-freeway corridor, and the AQ and health risk assessments must be updated accordingly. | LOC 1-7

- The increased capacity will impact traffic in El Segundo as more vehicles will end in/near El Segundo. Additional analysis must be conducted to determine or estimate how much additional traffic is expected to travers El Segundo. The additional analysis must include impacts (and appropriate mitigation) to intersections in El Segundo, including: | LOC 1-8
 - PCH/Imperial, PCH/Mariposa, PCH/El Segundo, PCH/Rosecrans
 - Imperial/Nash and the westbound 105 Nash exit
 - Imperial/Aviation
 - Aviation/El Segundo

The City of El Segundo expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); Bakersfield Citizens for Local Control v. Bakersfield (2004) 124 Cal. App. 4th 1184, 1199-1203; see Galante Vineyards v. Monterey Water Dist. (1997) 60 Cal. App. 4th 1109, 1121. | LOC 1-9

Sincerely,



Michael Allen, AICP
Community Development Director



- Steve Jones**
Mayor
- George S. Brietigam**
Mayor Pro Tem - District 1
- John R. O'Neill**
Council Member - District 2
- Cindy Ngoc Tran**
Council Member - District 3
- Joe DoVinh**
Council Member - District 4
- Stephanie Klopfenstein**
Council Member - District 5
- Kim Bernice Nguyen**
Council Member - District 6

January 10, 2024

Southern California Association of Governments
Attn: Ms. Karen Calderon
900 Wilshire Blvd, Suite 1700
Los Angeles, California 90017

RE: Public Notice of Availability (NOA) of a Draft Program Environmental Impact Report for Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy)

Dear Ms. Calderon,

Thank you for providing the Notice of Availability (NOA) of the Draft Program Environmental Impact Report for Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy). The Community Development Department, of the City of Garden Grove, has reviewed the documents. The following comments are provided for your consideration:

LOC 2-1

- Page ES-5, 2nd paragraph: Document states that of the total housing stock in the SCAG region (6.2 million households), 54 percent are single-family homes. It is unclear if this percentage value is inclusive of ADUs (Accessory Dwelling Units) and/or SB 9 units.
- Page ES-7, Footnote #2: Footnote states that, at the time of the writing of this document, only 12 out of 197 jurisdictions had certified housing elements. According to HCD’s Housing Element Review and Compliance Report, 127 out of the 197 jurisdictions had certified housing elements. Please verify if SCAG’s preliminary growth forecast, which is currently based on limited housing element data, would be impacted by the additional data available from the housing elements subsequently certified. Furthermore, please confirm any implications to the EIR’s analyses.
- Page ES-13, 2nd paragraph, 1st sentence: Document includes following typo, “Error! Reference source not found.”
- Page ES-15, 3rd paragraph: The document states, “SCAG also has no authority or jurisdiction to require these agencies to implement project-specific mitigation measures”. The document further states, “In addition, the 2024 PEIR identifies project-level mitigation measures for lead agencies to consider which they “can and should” adopt, as applicable and feasible, in subsequent project-specific design, CEQA review, and decision-making processes. (See CEQA Guidelines Section 15091(a)(2))” (Page ES-16, 1st paragraph). Please confirm if there any potential implications to local jurisdictions as it relates to any level of obligation to implement any of the mitigation measures included in Connect SoCal 2024.

LOC 2-2

LOC 2-3

LOC 2-4

LOC 2-5

- Page 2-12, Table 2-1: The plan focuses primarily on locating new housing in close proximity to job- and transit-rich areas. The City would encourage adopting policies within the plan that emphasizes a balance between future employment growth, population growth, and households. For example, Table 2-1 demonstrates that the counties of Riverside, Imperial, San Bernardino, and Ventura, project significant employment increases to 2050. In line with efforts to reduce VMT, policies that would encourage the development of housing in growing job centers would be consistent with the intent of Connect SoCal 2024. | LOC 2-6
- Page 3.2-18, PMM-AG-3: Impact refers to forest land and timberland. However, the associated mitigation measure, PMM-AG-3, refers to farmland. This inconsistency is also present on Page ES-22, IMPACT AG-3. | LOC 2-7
- Page 3.4-44, PMM-BIO-4: Subsection (e) states, "Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season." According to federal law, there are no standard nest buffers specified in the Migratory Bird Treaty Act or within California Fish and Game Code. The establishment of a standard 300-foot buffer may not be appropriate for all bird species. Buffers typically depend on the species type and may be larger or smaller than 300 feet. | LOC 2-8
- Page 3.8-44, Table 3.8-6: Under the column, "Municipality has a standalone climate, sustainability, and/or resilience plan?", the table lists the City of Garden Grove as "No". While the City does not have a standalone climate, sustainability, and/or resilience plan, the City would like to note that it has an adopted Local Hazard Mitigation Plan, and the City's Safety Element includes policies related to climate, sustainability, and resiliency. | LOC 2-9

Throughout the development of the Connect SoCal 2024 plan, we encourage communication with the City of Garden Grove on any pertinent matters discussed herein. If you have any questions, please contact me at (714) 741-5314 or chrisc@ggcity.org. | LOC 2-10

Sincerely,



Chris Chung
Senior Planner



CITY OF HUNTINGTON BEACH

DEPARTMENT OF COMMUNITY DEVELOPMENT

PLANNING ♦ BUILDING ♦ PERMIT CENTER ♦ ECONOMIC DEVELOPMENT ♦ HOUSING ♦ CODE ENFORCEMENT

January 12, 2024

Connect SoCal 2024

Attn: Ms. Karen Calderon

Southern California Association of Governments, Regional Council

900 Wilshire Blvd., Ste. 1700

Los Angeles, CA 90017

Submitted via email to: ConnectSoCalPEIR@scag.ca.gov

RE: CITY OF HUNTINGTON BEACH DRAFT CONNECT SOCAL 2024 AND PEIR COMMENT LETTER

Dear Ms. Calderon,

Thank you for the opportunity to submit comments on the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal 2024 or the Plan) and the associated Program Environmental Impact Report (PEIR). The City of Huntington Beach (the City) appreciates the Southern California Association of Governments' (SCAG) public outreach efforts for this process and offers the following comments and concerns for your consideration and response.

LOC 3-1

Priority Development Areas (PDAs)

The City of Huntington Beach recognizes the alignment of SCAG's Regional Housing Needs Assessment (RHNA) and RTP/SCS documents are required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m), however, we do not agree with the use of Priority Development Areas (PDAs), such as Neighborhood Mobility Areas (NMAs) and Transportation Priority Areas (TPAs), for future purposes related to the RHNA methodology. Notably, the Plan and its appendices states that local jurisdictions were tasked with reviewing the PDAs and NMAs. However, this statement is false and misleading to the SCAG Regional Council. SCAG's Data Map Books inform member jurisdictions that reviewing the NMAs is an optional task. This continues a pattern of SCAG communicating to its governing bodies and the public that local jurisdictions were explicitly "tasked with" and "vetted" the PDAs and NMAs. The City of Huntington Beach hereby reincorporates and restates its comments regarding the inadequacy of the 2022 Data Map Books that were utilized to inform the 2024 Connect SoCal Plan and PEIR in its letter dated December 1, 2022.

LOC 3-2

Furthermore, we do not agree that local jurisdictions should be held to these PDAs, as development patterns within a city are subject to change, and such project areas depicted

in the Plan and PEIR may not be viable for future development, which, according to the Plan, may involve right-of-way (ROW) acquisition and the potential for displacement of homes and businesses. Further analysis in the Final EIR should be conducted to fully understand the impacts of PDAs. Additionally, Map 2-9 in the PEIR is difficult to read and does not clearly identify the areas that may be impacted by PDAs. The City of Huntington Beach requests that inset maps of each county be included to adequately review the PEIR's PDA locations.

Green Region Resource Area (GRRAs)

According to the draft Plan, projects that fall within GRRAs often must take actions to address environmental impacts, areas with multiple convergences of GRRAs topic areas will likely be more costly to develop due to more intense legal requirements. Therefore, SCAG's approach of de-emphasizing growth in areas with the highest number of convergences is sensitive to market considerations. Further, the preservation and restoration of GRRAs can reduce risks from climate change and promote future resilience in the region. Map 2-10 in the PEIR depicts GRRAs within the SCAG region, however, it is difficult to read. Considering the City is impacted by topic areas such as FEMA flood zones, coastal inundation, and sensitive habitat areas, it is necessary for inset maps of each county be included to adequately review GRRAs. In addition, we request analysis and maps specifically for SCAG areas with overlapping PDAs and GRRAs. This additional information will allow us to properly evaluate the Plan and provide adequate feedback.

LOC 3-2
(cont.)

Coastal Issues

Through its various administrative agencies, the State of California has declared that the impact of sea level rise and planning for coastal inundation is of great concern. The State's Ocean Protection Council (OPC) adopted its first sea level rise guidance document in March 2013. The California Coastal Commission (CCC) has adopted multiple guidance documents since 2015 regarding climate change, sea level rise, and coastal inundation utilizing the best available data. At their May 13, 2020 meeting, the CCC adopted a document titled, "Making California's Coast Resilient to Sea Level Rise: Principles for Aligned State Action." CCC said that the document is a tool for aligned, consistent state agency action in planning and preparing for a minimum baseline 3.5 feet of sea level rise statewide. The principles outlined in the document are intended to guide unified, effective action towards sea level rise resilience for California's coastal communities, ecosystems, and economies across state agencies in order to improve effectiveness in addressing this immediate challenge.

LOC 3-3

Despite the declaration by State agencies concerning sea level rise, it is notable that the OPC and the CCC have not been engaged in the public review process. The CCC and the OPC are key stakeholders for jurisdictions in the coastal zone across the State. Development proposals in the coastal zone are subject to final approval of the CCC even if the jurisdiction has a certified Local Coastal Program. The CCC has the ability to appeal

a City's approval of any project within the coastal zone and conduct their own review of the project, which may ultimately result in project disapproval beyond control of the City. Potential rezoning and associated land use changes required to adequately plan for any RHNA methodology allocations will necessitate a Local Coastal Program Amendment for all jurisdictions with certified Local Coastal Programs. Coastal jurisdictions may adopt land use changes to align with the Connect SoCal plan, but there is no guarantee that those changes will be approved by the CCC.

SCAG's Connect SoCal has not addressed the impact of sea level rise (SLR), coastal inundation, and other coastal issues or the ability of coastal jurisdictions to plan for their RHNA. SCAG's 2022 RTP Data Map Book for Huntington Beach includes an exhibit depicting "Coastal Inundation (Sea Level Rise) in Orange County." Nearly all of the lowest lying land in Orange County is within Huntington Beach and its annexation of Sunset Beach; a small portion affects Newport Beach and Seal Beach. The data from the Map Book does not utilize the best available science/data as the State has since revised SLR analysis to plan for a baseline of 3.5 feet of SLR statewide and the map only depicts 1 meter of SLR (3.28 ft.). It must also be noted that the Map Book contains these exhibits and information regarding SLR but SCAG does not utilize them for any analysis within Connect SoCal.

LOC 3-3
(cont.)

SCAG fails to address this critical information from the CCC. Coastal cities are explicitly unable to accommodate any new development (especially residential development) in the Coastal Zone and adjacent areas, as it is specifically vulnerable and unable to adapt to managed retreat within areas of sea level rise. The CCC expects all LCPs to recognize that public lands adjacent to the Pacific Ocean and harbors will extend inward as a direct result of sea level rise. This information alone indicates that coastal cities will lose land available for development (and land that is currently developed) to the public trust boundary. The CCC also recommends that coastal cities purchase land within areas of sea level rise to remove all associated structures and conserve the land as open space.

In the past, Connect SoCal, including the associated PEIR, characterized coastal cities resistant to new development due to "community resistance to new housing, especially medium and high density projects." Although the PEIR now lists general background information and the requirements imposed on coastal cities by the Coastal Act and the Coastal Commission, it does not use this information in any of the impact analyses. The development challenges faced by coastal cities due to sea level rise appear to be completely ignored by PEIR and replaced with the politics from other areas of the SCAG region to keep RHNA numbers and housing out of their jurisdictions.

LOC 3-4

It now appears the PEIR is extending this generalization to the SCAG region as cause of the housing crisis. It appears that SCAG purposefully does not acknowledge any relevant information regarding the significant negative environmental impacts and CCC policies on development other than protected open space within areas subject to sea level rise, including SCAG's own Data Map Book exhibits produced in 2017. Excluding this pertinent analysis from the RHNA and RTP/SCS process enables Connect Social and RHNA to

arbitrarily and capriciously achieve Governor Newsom's admitted "stretch goal" to construct 3.5 million units in California by 2025.

All lands within the state of California that are subject to sea level rise, including those within the SCAG region such as Huntington Beach, must be removed from the model scenarios in both the Plan and the PEIR, and subsequently excluded from any RHNA calculation (including but not limited to job accessibility, HQT proximity, reallocated residual need, and additional social equity adjustments) in order for Connect SoCal and RHNA to be consistent (Government Code Section 65080(b)(2)(B) and Section 65584.04(m)).

LOC 3-4
(cont.)

Project List

The Plan includes a Project List of funded projects within the SCAG region; however, many projects listed within the Draft Connect SoCal Project List are not descriptive enough to understand or verify information. To properly evaluate the Plan and provide adequate feedback, the project list should be updated to be descriptive enough to understand what the project entails. As stated in Chapter 3 of the Plan, the projects listed are regionally significant to meet the needs and goals of each county, therefore, transparency of these projects is important to ensure that these needs and goals are being met. Please provide the aforementioned information for the following projects:

1. Digital Bus Stop Signs/Electronic Message Signs Along High-Quality Transit Corridors (FTIP ID: ORA219901)
2. Group Projects for Planning and Technical Studies (FTIP ID: ORA171901)
3. Transit Service Expansion Planning (FTIP ID: ORA230504)
4. Orange County – Countywide Activities: Planning, Programming, and Monitoring (FTIP ID: ORA040607)
5. Microtransit Service Expansion (Capital) (FTIP ID: 324T010)
6. Microtransit Service Expansion (O&M) (FTIP ID: 324T011)
7. OC Transit – Corridor Improvements (FTIP ID: 2200T001)
8. OC Mobility Hubs Network (FTIP ID: 324T012)

Support for Comments and Recommendations Submitted by Other Groups

The City of Huntington Beach expresses support for comments made by the Center for Demographic Research (CDR) and the Orange County Council of Governments (OCCOG). The City would like to highlight the following comments from CDR and OCCOG that are of the highest level of concern:

LOC 3-5

1. CDR RTP/SCS and OCCOG comments which revise text to maintain an objective/unbiased tone, delete sensationalized language, and include meaningful evidence to support generalized claims about the SCAG region.
2. OCCOG comments opposing any alternative in the PEIR that does not utilize local input, including the intensified land use alternative. Any alternative that

LOC 3-6

- does not properly reflect all development agreements, open space protections, and recent or ongoing construction submitted by jurisdictions should not be utilized as the preferred alternative. | LOC 3-6 (cont.)
3. OCCOG PEIR comments regarding the usage of "can and should" in mitigation measures. Revise all mitigation measures to be "considered where applicable and feasible" to clarify that these mitigation measures are a menu of options and not requirements. | LOC 3-7
 4. CDR RTP/SCS and OCCOG comments which endorse the ongoing utilization of growth forecast data supplied by local jurisdictions in forthcoming Plan updates to ensure accurate representation of development agreements, entitlements, current and recent construction, open space, and general plan densities. | LOC 3-8
 5. OCCOG's matrix of comments on the Draft Connect SoCal 2024 (RTP/SCS) plan documents and Technical Reports. | LOC 3-9

Conclusion

Thank you for the opportunity to comment on the Draft Connect SoCal 2024 Plan and Program Environmental Impact Report. The City of Huntington Beach appreciates SCAG's commitment to a fair and transparent process and will continue to be an active participant in the 2024 Connect SoCal process. | LOC 3-10

Sincerely,



Joanna Cortez
Senior Planner

Cc: Jennifer Villasenor, Director of Community Development
Ricky Ramos, Planning Manager
Nicolle Aube, Senior Analyst



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Subject: Comments on Connect SoCal, the Draft 2024 Regional Transportation Plan/Sustainable Communities Strategy and Draft Program Environmental Impact Report

Kome Ajise:

The City of Irvine appreciates the opportunity to review and provide comments on Connect SoCal, the Draft 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (2024 RTP/SCS) and the Draft Program Environmental Impact Report (PEIR). The draft 2024 RTP/SCS and PEIR is a significant effort the City of Irvine recognizes is critical to the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction targets and other air conformity standards.

LOC 4-1

The following general comments and recommendations are offered by the City of Irvine on the 2024 RTP/SCS, associated appendices, and PEIR. In support of this letter, please find attached more specific detailed comments from the City of Irvine that are consistent with the comments provided by the Orange County Council of Governments (OCCOG) and the Center for Demographic Research (CDR) at California State University Fullerton. The City of Irvine requests that this letter and all of its attachments be included in the public record as our collective comments on the 2024 RTP/SCS, PEIR, all associated appendices and documents, and online inventory of maps.

1. The City of Irvine concurs with the comments prepared by the Orange County Council of Governments (OCCOG) and the Center for Demographic Research (CDR) at California State University Fullerton

LOC 4-2

The City of Irvine concurs with the comments SCAG will receive from the OCCOG and the CDR. The City requests that SCAG respond to all of the comments detailed in the OCCOG and CDR letters and to act upon any changes advocated by OCCOG, of which the City is a member agency.

2. Connect SoCal consistency determinations

The City supports OCCOG's proposed Consistency Language which

LOC 4-3

establishes limitations of the use of the growth forecast data and forecasted development pattern. The City also supports OCCOG's request to use the proposed language to replace the current applicable language in the Demographics and Growth Forecast Technical Report, and to incorporate the language to the main RTP/SCS document at the end of page 97, the Land Use & Communities Technical Report, and as a response to comments in the draft PEIR. The full text of the requested Consistency Language is included in Attachment 1 of OCCOG's letter.

In addition, any maps or figures that contain or depict the growth forecast data, including TAZ-level maps or development patterns, need to have the following language embedded in the map or figure.

Insert data usage paragraph:

"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."

3. Priority Development Areas (PDAs)

The City recognizes SCAG's movement away from High Quality Transit Areas (HQTAs) that were focus areas in the 2020 RTP/SCS and the 6th RHNA cycle to now focus on Priority Development Areas (PDAs) in the 2024 RTP/SCS. The City also recognizes the alignment of SCAG's Regional Housing Needs Assessment (RHNA) and RTP/SCS documents are required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m); however, the City recommends extreme caution and requests close consultation with local jurisdictions for any use of PDAs, such as Neighborhood Mobility Areas and Transportation Priority Areas, identified in the RTP/SCS for future purposes related to the RHNA methodology and more. Further the City of Irvine strongly advises that local jurisdictions shall not be held to these PDAs, as development patterns within a city and/or county are subject to change and such locations identified in the RTP/SCS may not be viable for future development. Jurisdictions and the Technical Working Group should be consulted for any methodology to develop future RHNA allocations or in using PDA's for RHNA and/or other purposes.

LOC 4-3
(cont.)

LOC 4-4

4. Growth Forecast

The City greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2024 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities. The City opposes any alternative in the PEIR that does not utilize local input provided through the local input/Local Data Exchange (LDX) process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction submitted by jurisdictions should not be utilized as the preferred alternative.

We also want to express our appreciation for the LDX process during this iteration whereby SCAG folded in the growth visioning and policies into the initial draft growth forecast that was provided to local jurisdictions for review during the LDX process. The City along with OCCOG has staunchly advocated for this approach since the 2012 RTP/SCS development process. The inclusion of the local jurisdiction input submitted on housing and employment directly into the RTP/SCS—and unchanged— demonstrates the successful collaborative visioning along with accurately reflecting entitlements and local policies and plans. We urge SCAG to continue this same process in future iterations.

LOC 4-5

5. Process Concerns

We emphatically recommend the timeline for development of the RTP/SCS be revised in the 2028 cycle to allow for a more robust review process prior to the holidays—or even completion of the whole process before the holidays—which would ensure that comments being provided as part of the public comment period have the opportunity to be fully considered by SCAG staff and the policy committees, and stakeholders and jurisdictions have the opportunity to ensure that comments have been addressed, prior to asking the Regional Council to adopt the final plan. This has been a long-standing concern since the 2012 RTP/SCS iteration where each Plan has been released near the holidays and the public comment period has covered holidays and closures that often make it difficult to find ample time for thorough technical review of the hundreds of pages of documents before comments are provided to governing boards for consideration to submit as official public comment.

LOC 4-6

6. Remain Neutral on Technology

Throughout the documents, there are specific examples of technology identified. It is not SCAG's purview to pick winners and losers in technology; the marketplace will determine dominant technologies. Therefore, it should be noted that these are only examples and that future technologies should not be ignored or excluded from meeting the goals of the RTP/SCS. This will allow the document, including mitigation measures, to be more inclusive of and responsive to changing technological advances.

LOC 4-7

Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG’s desire to facilitate and support innovation but avoid naming specific technologies or providers (example “TNCs” not “Uber and Lyft” or “zero emissions” instead of “electrification”).

LOC 4-7
(cont.)

7. Maintain Unbiased, Objective Tone

Language throughout the draft Connect SoCal Plan and PEIR and the associated technical reports and appendices tends to be in first-person tone, leading, and dramatic in its emphasis of certain key issues, such as housing, equity, and land use policy. While these issues are important, using opinion-based and emotionally charged language is inappropriate in this context.

LOC 4-8

Recommendation: SCAG should remove, wherever applicable, opinion and descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region.

8. “Can and Should”

As indicated in the PEIR, state law provides that it is appropriate to indicate in mitigation measures that they “can and should” be implemented where the authority to implement the measures rest with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies’ regulatory measures. The City recognizes SCAG’s use of the words “can and should” are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies’ land use authority, The City deems any language seemingly imposing affirmative obligations contrary to SB 375 inappropriate. As such, the use of the language “can and should” for mitigation measures addressed to local agencies is overreaching. SCAG should therefore add the following qualifier subsequent to each use of “can and should”: “where applicable and feasible”.

LOC 4-9

Recommendation: Ensure consistent language in each project-level mitigation measure by adding “where applicable and feasible.” This change will clarify that the project-level mitigation measures are a menu of options.

9. Duplicative/Existing Regulations

It is noted that many of the mitigation measures are duplicative of existing

LOC 4-10

regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified to reduce or avoid impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact, and the significance of the impact should be looked at after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If SCAG opts not to remove mitigation measures that restate existing regulation, then the City requests that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken.

LOC 4-10
(cont.)

Recommendation: The City proposes the use of: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” and acknowledges SCAG has already included similar language in some mitigation measures.

10. Provide Sources for All Graphics and Tables

When a report of such complexity as the Connect SoCal Plan is produced, it is common for tables, maps, and other graphics to be used or referred to in a manner that could divorce them from the context in which they are presented. For instance, someone may come upon a chart that explains a topic they are researching and could download the image separate and apart from the technical explanation accompanying it in the electronic version of the document. Without original source information embedded in the graphic, information can be spread without proper attribution. We understand that it may “look cleaner” to not include a source, date, and citation for data but best practices for technical reports include adding sources to all graphics. In addition, citing another SCAG report as the source instead of the original data source should be avoided.

LOC 4-11

Recommendation: Make it a SCAG style guide policy to include the original source and date of all data used in tables, charts, maps, infographics etc. included in all Connect SoCal-related documents. All related documents should also be branded with “Connect SoCal 2024” to differentiate from past and future iterations.

11. Project List

The “OC Maintenance Facility” identified on page 105 of the Connect SoCal Plan

Project List is located within the City of Irvine and is subject to the approval of a Conditional Use Permit.

Recommendation: Add the following footnote to the “OC Maintenance Facility” identified on page 105 of the Connect SoCal Plan Project List:
“The OC Maintenance Facility is subject to the approval of a Conditional Use Permit from the City of Irvine.”

The City of Irvine appreciates your consideration of all comments provided in this letter and enclosure and looks forward to your responses. It is a shared goal to have a Regional Transportation Plan and Sustainable Communities Strategy adopted by the April 2024 deadline that represents the best in regional planning developed collaboratively with local jurisdictions and stakeholders in a manner that is credible and defensible on all levels.

LOC 4-12

If you have any questions, please do not hesitate to call me.

Sincerely,



Eric M. Tolles
Interim Director of Community Development

Enclosure: Detailed Comments on the 2024-2050 RTP/SCS, PEIR, and Related Appendices – City of Irvine

Cc: Oliver Chi, City Manager
Jeff Melching, City Attorney
Pete Carmichael, Assistant City Manager
Jaimee Bourgeois, Director of Public Works and Transportation
Sean Crumby, Acting Director of Public Works and Transportation
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Deborah Diep, Director, Center for Demographic Research (email)

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

Contents

Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS & GENERAL COMMENTS.....	1
Table 2. PEIR COMMENTS.....	23
Table 3. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS.....	48
Table 4. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS.....	49
Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS.....	50
Table 6. ECONOMIC IMPACT ANALYSIS TECHNICAL REPORT COMMENTS.....	58
Table 7. EQUITY ANALYSIS TECHNICAL REPORT COMMENTS.....	61
Table 8. GOODS MOVEMENT TECHNICAL REPORT COMMENTS.....	64
Table 9. HOUSING TECHNICAL REPORT COMMENTS.....	65
Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS.....	78
Table 11. MOBILITY TECHNICAL REPORT COMMENTS.....	87
Table 12. PERFORMANCE MONITORING TECHNICAL REPORT COMMENTS.....	89
Table 13. PROJECT LIST TECHNICAL REPORT COMMENTS.....	91
Table 14. PUBLIC PARTICIPATION AND CONSULTATION TECHNICAL REPORT COMMENTS.....	91
Table 15. TRANSPORTATION CONFORMITY ANALYSIS TECHNICAL REPORT COMMENTS.....	92
Table 16. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS.....	92
TABLE 17. TRAVEL AND TOURISM TECHNICAL REPORT COMMENTS.....	95

Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS & GENERAL COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION	
1.	General Comment	All documents	Include “2024” in all headers for proper citation/reference since the last plan was also called “Connect SoCal”.	LOC 4-13
2.	General Comment	All documents	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data	LOC 4-14
3.	General Comment	All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.	LOC 4-15
4.	General Comment	All documents	For data that is not derived from Connect SoCal models, cite source.	LOC 4-16
5.	General Comment	All documents	If definitions come from specific source or statute, include the reference in the narrative and the glossary.	LOC 4-17
6.	General Comment	All Technical Reports	Add “Technical Report” and “2024” to all technical report page headers’ titles	
7.	General Comment	All documents	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.	LOC 4-18

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION				
8.	General Comment	All documents	Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence” the growth must be feasible				LOC 4-19
9.	General Comment	All documents	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.				LOC 4-20
10.	General Comment	All maps and figures with growth forecast data, TAZ data, or forecasted development pattern	Add: language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”				LOC 4-21
11.	Correction	All pages All documents e.g., 45, 50, 59, 60, 96	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”				LOC 4-22
12.	General Comment	All pages	“state of California” should be “State of California” “county/counties of xxx” should be “County of xxx”				LOC 4-23
13.	General comment	N/A	There are several goals related to promoting equity within the SCAG region as it relates to land use and transportation patterns. Elsewhere in the document, SCAG relies upon a vehicle miles traveled- (VMT)-based tax. Implementation of this tax, as with the current gas tax, would be contrary to SCAG’s stated goal of promoting equity as it would disproportionately affect lower-income individuals who travel long distances to reach their place of employment. Explain how these strategies would promote equity.				
14.	General comment	N/A	The document and technical appendices include maps of PDAs, which indicate areas that are anticipated to experience the most change by Plan implementation. Despite that fact, the figures illustrating the proposed PDA locations are impossible to read at their current scale (both in a printed and online format). At this scale, the PDA figures and many of the other figures fail to adequately disclose relevant project information that is required for each affected jurisdiction to properly review and consider the full extent of the Plan’s environmental impacts. All maps containing project information should be provided at a scale that is readable to each jurisdiction.				
15.		Glossary	Add to glossary:	CPI	LMFP	SCP	LOC 4-24

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION			
			15-minute communities ACS AFFH ASMSA AT AVTA BTU BUILD CAL ITP CALFIRE CAV CCED CCSO communities of color CPAD	CTC DOT EEC FEMA FHSZ FLMA FMMP GDP historically marginalized HQTACs HSD ICT Indigenous populations INFRA LC LMFDS	MBPS MIP NHHW NHS OCFC PACT Protected populations p.188 Priority communities p.188 PTS PUMS RFM1 RIF RRIF RTPAS SAFETEA-LU SCM1 SCORE	SCRR SMAQ SOAR SOT SPM SSO TCA TEZ TIF TMO TMP TWMO UBM WHAR12 ZETI
16.	Revision	p. 9, second paragraph under "Mobility"	Revise the last sentence and insert the word "safety." For example: "However, more work is needed to be better manage both the viability, safety , and reliability..."			
17.	Correction	p. 10	RH column. SB 375 was passed in 2008, please delete reference to this as recently passed. "..With the more recent passage of SB 375."			
18.	Clarification	p. 10; column 1; paragraph 1; last sentence	"SCAG will collaborate with federal, state and local partners to ensure that the implementation of the Plan helps address existing air-quality challenges, preserve <u>most reasonably utilize</u> natural lands and reduce GHG emissions."			
19.	Comment	p. 12, first bullet point under "Focusing on Objectives"	Explain how SCAG aims to make transit the backbone of the transportation system? It seems to contradict the current state of our transit system – low ridership and public safety concerns.			
20.	Clarification	P. 12, column 2; paragraph 3	"This plan projects that s Sixty-seven percent of new households and 55 percent of new jobs between 2019–2050 will be located in Priority Development Areas, either near transit or in walkable communities."			
21.	Clarification	P. 13, column 2; paragraph 1; last sentence	"Within those elements, the Plan also strives to achieve broader regional objectives, such as increased housing production, improved equity and resilience, the preservation <u>most reasonable utilization</u> of natural lands, improvement of public health, increased transportation safety, support for the region's vital goods movement industries and more efficient use of resources."			
22.	Clarification	p. 14 & p. 78	SCAG stated that it is not in charge of implementation, but the graphic and its presentation seems to imply that SCAG is a part of implementation. Make SCAG's role more clear in that it is not in charge of implementation.			

LOC
4-24
(cont.)

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
23.	General comment	p. 26	<p>This Plan includes strategies that were in 2020; therefore, not new ideas. Should Section 2 include a summary of how the last RTP/SCS performed. “Since approval of the 2020 RTP/SCS the region has made great progress in these areas...”</p> <p>What was the performance of the 2020 RTP? A summary of the 2020 RTP/SCS Progress provided on pages 178-179 should be summarized at the beginning of Chapter 2. Where are we at and what needs to be done? There was no initial summary at the beginning of the report, which would have been helpful.</p>
24.	Clarification	p. 29; paragraph 3 last sentence	<p>“The history of <u>some</u> transportation and housing policies in both the United States and California demonstrates how racism in government...”</p> <p>“This data shows that 18.4 percent of fatal collisions in 2021 involved <u>non-Hispanic Black</u> victims, who represent just over 6 percent of the population.”</p> <ul style="list-style-type: none"> • Is this 18.4% of walking and biking fatalities or all transportation fatalities? • Cite data source for fatalities.
25.	Clarification	p. 31, column 1, paragraph 1	<p>“The COVID-19 pandemic <u>and the response to it</u> impacted the way we live, work and play in the region—and we are still feeling those impacts today. When SCAG’s Regional Council adopted Connect SoCal 2020 for all purposes in September 2020...”</p> <ul style="list-style-type: none"> • Clarify what “for all purposes” was Connect SoCal adopted.
26.	Clarification	p. 31, column 1, paragraph 3; sentence 2	<p>“The pandemic <u>response</u> provided additional shocks – a near-zero level of foreign immigration, fewer births and excess deaths from the pandemic itself.”</p>
27.	Clarification	p. 34, column 2, paragraph 2; last sentence	<p>“These Guiding Principles should be considered as a starting point and <u>may be used</u> as building blocks that agencies and local jurisdictions can adapt to fit their unique needs when making informed decisions regarding emerging technology.”</p> <ul style="list-style-type: none"> • Are agencies required to use these or adapt them for use?
28.	Source	p. 35	<p>Second paragraph under Climate Change, what is the source of the information provided.</p>
29.	Clarification	p. 38, column 1, paragraph 1; sentence 2	<p>“We are home to an ... 109 miles local light rail, serving 108 stations, Amtrak intercity and long-distance services; ...”</p> <ul style="list-style-type: none"> • Clarify 109 phrase
30.	Clarification	p. 38, column 2	<p>Add final statement: “<u>Maps contained in Connect SoCal are for general reference and provide snapshots of the region. Please contact the appropriate agency for the most recent information.</u>”</p>
31.	Clarification	p. 39, map 2.1	<ul style="list-style-type: none"> • Change “City boundary” in legend to date of city boundary, e.g., “January 1, 2023 City boundaries” • Freeway and highways are difficult to tell apart; change symbology. • Relabel Freeways to <u>Freeways/Toll Roads</u> • Add Year to title • Define bottlenecks or add note referring reader to Technical Report if information is included in another Connect SoCal document.
32.	Clarification	p. 40, map 2.2	<ul style="list-style-type: none"> • Why is map labeled 2019/2022? • Label each layer’s year as applicable or add source notes.

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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			<ul style="list-style-type: none"> Add definitions of rapid bus and bus rapid transit or add note referring reader to where the definitions are.
33.	Clarification	p. 41, map 2.3	<ul style="list-style-type: none"> Add year to title Change “City boundary” in legend to date of city boundary, e.g., “January 1, 2023 City boundaries” Freeway and class 1 bike lanes are difficult to tell apart; change symbology. Add definitions for lane classifications or refer readers to locations. Clarify the two sets of bike lanes Relabel Freeways to <u>Freeways/Toll Roads</u>
34.	Clarification	p. 42, map 2.4	<ul style="list-style-type: none"> What data year is map displaying? Change “City boundary” in legend to date of city boundary, e.g., “January 1, 2023 City boundaries” Freeway and arterials are difficult to tell apart; change symbology. Relabel Freeways to <u>Freeways/Toll Roads</u>
35.	Clarification	p. 45, paragraph 1; sentence 2	<p>“<u>Responses to the COVID-19 pandemic</u> sparked changes in travel behavior and trends, which spotlight what is needed and what is possible for the future of transportation in our region.”</p>
36.	Clarification	p. 47, column 2; paragraph 2	<p>“The patterns that characterize our communities largely come down to housing and households. Over half of the region’s 6.6 million housing units were built before 1980. <u>For the purposes of Connect SoCal, the category of “multi-family” residential units includes townhomes, which are defined by the State of California Department of Finance and the U.S. Census Bureau as single-family homes. The category Connect SoCal refers to as ‘multi-family’ units that are attached residences, including apartments, condominiums and townhouses.</u> While 54 percent are single-family homes, 46 percent are multifamily homes such as condominiums, townhouses and apartments...”</p>
37.	Clarification	p. 47, column 2; paragraph 2; sentence 4	<p>“The predominant form of new housing construction has fluctuated over time—a function of the number of people entering their 20s and 30s (the main household formation years) and other aspects of the housing market, <u>including limited land availability in some parts of the region.</u>”</p>
38.	Clarification	p. 48, Figure 2.1	<p>Is this the number of permits issued or number of units permitted? DOF doesn’t report the number of permits in E-5 file.</p>
39.	Revision/Deletion	p. 49	<p>Remove and/or revise the exhibit on this page. It appears that the region is building housing beyond the population growth needs.</p>
40.	Clarification	p. 49, column 1; paragraph 1; sentence 2	<p>“...In a high-cost urban megaregion with decreasing family sizes, the single-family-heavy skew of the current housing stock puts homeownership more out of reach for low- and moderate-income households, while also increasing overcrowding rates and travel distances.”</p> <ul style="list-style-type: none"> Doesn’t more single-family units increase the number of options for buyers, which result in a benefit through the ability to build equity?
41.	Clarification	p. 49, column 2 figure	<ul style="list-style-type: none"> What was pattern of building 1950-1980? Did we overbuild, underbuild or right-size build? 2000-2020 “green” housing figures- does this imply we overbuilt in 2000-2020 period? Is assumption of 3.0 pphh appropriate?
42.	Clarification	p. 51, map 2.5	<ul style="list-style-type: none"> Add to title “(Jobs per ____ square mile? ____)”

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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			<ul style="list-style-type: none"> Relabel Freeways to <u>Freeways/Toll Roads</u>
43.	Clarification	p. 52, map 2.6	<ul style="list-style-type: none"> Add to title “(per ___ square mile? ___)” Relabel Freeways to <u>Freeways/Toll Roads</u>
44.	Clarification	p. 53, map 2.7	<ul style="list-style-type: none"> Add data year to title Add link to where land use definitions are Explain if these are the consolidated land use categories and not the original jurisdiction maps
45.	Clarification	p. 54, column 1; sentence 3	<p>“...Years of underbuilding has resulted in a shortfall in the number of units needed to house the region <u>comfortably</u> and created issues such as cost burden and overcrowding.”</p> <ul style="list-style-type: none"> Define cost burden & include reference source/as defined by... Define overcrowding & include reference source/as defined by...
46.	Clarification	p. 54, column 2; paragraph 2 sentence 1	<p>“The quantitative impacts of the housing crisis, such as overcrowding, cost burden and <u>low</u> home ownership, disproportionately burden communities of color.”</p>
47.	Clarification	p. 54, column 1; paragraph 1 sentence 5	<p>“Households that spend more than 30 percent of their income on housing are considered <u>cost-burdened</u>“overpaying” and will have less income to spend on both essential needs, such as food and transportation, and discretionary purchases.”</p> <ul style="list-style-type: none"> “overpaying” is not the same as “cost-burdened”- overpaying is associated with the cost of the rent, not the share of income being paid on rent.
48.	Clarification	p. 54, column 2; paragraph 1 sentence 1	<p>“A recent comprehensive study on the California homelessness crisis found that the majority (89 percent) of unhoused persons lived in California prior to becoming unhoused, and the primary factors leading to homelessness were economic or social.”</p> <ul style="list-style-type: none"> List or define the “social” factors.
49.	Clarification	p. 54, column 2; paragraph 2 sentence 1	<p>“Out-migration: While the region typically loses more residents to other states and counties than it gains, domestic out-migration increased notably early in the <u>COVID-19</u> pandemic. While slow or negative growth can reduce projected housing need, domestic out-migration reflects <u>several factors</u>, including the inability or lack of desire of Southern Californians to stay in the communities they call home. <u>Out-migration</u> is is one economic response to a too-small housing supply, alongside overcrowding, cost burden, becoming unhoused, and the suppression of life-cycle ambitions (e.g., household formation and homeownership).”</p>
50.	Clarification	p. 56, column 1; paragraph 1 sentence 2	<p>“...Poor Local air quality and the lack of dependable transportation options, active transportation, affordable housing, health care and job opportunities in many SCAG region communities can lead to poor health outcomes.”</p>
51.	Clarification	p. 56, column 1; paragraph 2; sentence 1	<p>“Natural lands (<u>see glossary for definition</u>) offer important benefits to the region, including capturing carbon emissions and recharging groundwater resources. However, natural lands have decreased by roughly 50,000 acres, or 0.2 percent, between 2012 and 2019. Farmland decreased by 40,000 acres, or 3.5 percent, between 2012 and 2018. While farming practices can contribute to GHG emissions, these are typically far less than emissions in urban environments, and farm and grazing lands can provide”</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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52.	Clarification	p. 56, column 2; paragraph 3 sentence 4	These conditions are known as the Social Determinants of Health (SDOH), and they help explain why <u>some</u> health outcomes (e.g., rates of asthma or diabetes) vary widely across the region.”
53.	Clarification	p. 56, column 2; paragraph 4 sentence 1	“The urbanization of the region over the past several decades has led to the consumption of hundreds of thousands of acres of natural land and farmland <u>to house and serve those residents.</u> ”
54.	Clarification	p. 58, column 2; paragraph 1 last sentence	“Communities in the SCAG region that depend primarily on wage income are missing out on the economic prosperity suggested by the growth in GDP <u>by...</u> ” <ul style="list-style-type: none"> • How are they missing out?
55.	Clarification	p. 59, Figure 2.3	Change title to “GDP Per Capita and Wage Income, 2010-2021”; current title is commentary.
56.	Clarification	p. 59, column 1, sentence 2	“ Though the The region’s well-diversified economic base <u>is well-diversified, it</u> may not benefit all people in the region equally.”
57.	Clarification	p. 61, map 2.8	Add data year to title
58.	Clarification	p. 62, column 1, paragraph 1, last sentence	“This will likely put additional strain on <u>social, safety-net programs</u> retirement funding , including Social Security.”
59.	Clarification	p. 64, column 2, paragraph 1, last sentence	“The program aims to build street-level community resiliency and increase the safety of people most harmed by traffic injuries and fatalities, prioritizing <u>non-Hispanic Black, Indigenous and other people of color;</u> ...”
60.	Clarification	p. 64, column 2, paragraph 2, last sentence	“Sustainable Communities Program: SCAG helps to advance Connect SoCal through the Sustainable Communities Program (<u>SCP</u>), which has facilitated over \$16.9 million in funding to local jurisdictions since...”
61.	Clarification	p. 65, column 1, paragraph 1	“Since Connect SoCal was adopted in 2020, transportation agencies and local jurisdictions have taken actions to <u>that</u> implement the Plan.” <ul style="list-style-type: none"> • Actions may or may not be specific to implementing Plan
62.	Clarification	p. 65, column 1, paragraph 2, sentence 2	“In March 2021, SCAG adopted its 6 th cycle Regional Housing Needs Assessment (RHNA)—based on Connect SoCal <u>2020’s</u> growth vision— by allocating units to cities and counties with the greatest job and ...”
63.	Clarification	p. 65, column 1, paragraph 2, last sentence	“These actions represent the first time the state provided funding to regions to conduct the RHNA program and support regional housing-planning efforts.” <ul style="list-style-type: none"> • REAP funds were used for SCAG to do RHNA?
64.	Clarification	p. 65, column 2, paragraph 1, sentence 3 & page 67, column 2 callout text in green	“Since Connect SoCal was adopted in 2020, SCAG has gained new responsibility for the selection of transportation projects to be funded with federal revenue sources, <u>such as CMAQs, STBG, and CRP</u> . SCAG’s project selection process follows a performance-based evaluation and selection approach—and ensures that selected projects further Connect SoCal goals.” <ul style="list-style-type: none"> • SCAG has the power to provide funding for transportation projects? Please provide examples.
65.	Correction	p. 68, column 3, paragraph 1, sentence 2	“Because the elements of the PACT were developed jointly, residents were uniquely empowered to cohesively develop their vision for active mobility and recreation in Riverside manner and then codify it through the Complete Streets Ordinance.”

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none"> “...in Riverside manner” sentence is incomplete
66.	Correction	p. 69, column 1, paragraph 1, sentence 2	“The grant application consists of ... at twenty-four at 24 intersection locations.”
67.	Clarification	p. 77, column 2, paragraph 3	“SCAG develops a forecasted development pattern that details where future jobs and housing <u>are projected to</u> will be located, based on expert projection, existing planning documents, regional policies, and review <u>and input by</u> local jurisdictions.”
68.	Clarification	p. 78	“Implementation: Jurisdictions take action at the local level <u>that may</u> to implement work that move[s] toward achieving this regional vision.”
69.	Clarification	p. 79, column 1, paragraph 2, sentence 1	“Consistency and consultation: During the development of the Plan, SCAG reviewed thousands of planning documents. These documents were developed <u>in part</u> by cities, counties and transportation agencies to <u>review</u> promote consistency between local plans, the Regional Transportation Plan, and federal and state documents like the California Transportation Plan.”
70.	Clarification	p. 79, column 2, paragraph 1, sentence 2	<p>“SCAG partnered with 16 community-based organizations, attended 20 pop-up events and collected over 3,600 survey responses.”</p> <ul style="list-style-type: none"> Please clarify if this is the number of respondents or number of questions answered by respondent providing answer. It is misleading if the answer is the latter and should be clarified.
71.	Clarification	p. 80, column 1, paragraph 2, sentence 4	“Consistent with global trends, the older-age population of the SCAG region is steadily growing. Understanding this demographic shift is vital for planning for the future. We want to better comprehend how an older population will live and travel—and how we can ensure they continue to fully engage in their communities. One of the clearest <u>ramifications</u> implications is <u>seen</u> in housing demand. Older people tend to live alone or in smaller households. Other major <u>ramifications</u> implications include...”
72.	Clarification & Correction	p. 81 Table 3.1	<p>Add note: “Numbers may not sum to total due to rounding.”</p> <p>Noting the above, the SCAG totals in Table 3.1 and in Table 12 of the Demographics Technical Report do not match—though the county totals do match. The SCAG totals should match across tables and documents.</p>
73.	Clarification	p. 82, column 3, paragraph 2, sentence 1	“Reconnecting Communities: Historic physical and economic segregation was caused by <u>some</u> U.S. housing and transportation policies and led to decades of inequalities. We are <u>now</u> planning policies and projects that involve removing, retrofitting or mitigating highways or other transportation facilities that create barriers...”
74.	Clarification	p. 83, column 1, paragraph 2, last sentence	“This program builds street-level community resilience and increase the safety of people most harmed by traffic injuries and fatalities, including without limitation, <u>non-Hispanic Black</u> , Indigenous and <u>other</u> People of Color; ...”
75.	Clarification	p. 83, column 2, paragraph 2, sentence 1	“Inclusive Economic Recovery Strategy (IERS): This report was developed to address the long-standing social and economic challenges heightened by the <u>responses to the COVID-19 pandemic</u> .”
76.	Clarification	p. 85, column 1, paragraph 1	“The following goals and subgoals will help <u>the SCAG region</u> to achieve this vision:”

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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		1, last sentence	
77.	Clarification	p. 87, first paragraph Mobility Stories	Is the Spring 2023 public outreach survey statistically significant? If not, it would not be an accurate statement to say there is pent up demand for more travel options as the survey data does not capture an accurate sample of the region. If anything, there is pent up demand for travel options for people who took the survey. Explain how a freshman at Santa Ana College (SAC) relies on OC streetcar to get to class. OC Streetcar is not near SAC.
78.	Clarification	p. 89	Funding the System/User Fees This paragraph discusses “user fees.” Clarify if this is essentially a VMT tax.
79.	Clarification	p. 91, column 1, paragraph 1, sentence 3	“But capital investment alone is not sufficient to achieve our vision for the region’s future or meet our greenhouse gas (GHG) emission reduction goals set by CARB.”
80.	Correction	p. 91, column 1, paragraph 1, sentence 2	“Connect SoCal 2024 increases investment and strengthens policy levers to optimize system performance while realizing greenhouse gas reduction <u>reductions</u> quickly and efficiently.”
81.	General Comment	p. 92	Retitle “Regional Express Lanes Network” to <u>Regional Express Lanes, HOT and Toll Lane Network: The Priced Transportation Network</u> . The text should then provide brief definitions of each type of facility that makes up the priced transportation network, as express lanes, toll roads and HOT lanes each operate differently.
82.	Clarification	p. 94, map 3.1	<ul style="list-style-type: none"> • Add data year to title for Planned Transit Network • The Rapid Bus and Bus Rapid Transit routes are not legible. Additionally, explain where the “SCAG 2022” source derives from.
83.	Clarification	p. 95, map 3.2	<ul style="list-style-type: none"> • Add data year to title • Retitle “Regional Express Lanes Network” to <u>Regional Express Lanes, HOT and Toll Lane Network: The Priced Transportation Network</u>.
84.	Clarification	p. 96, column 1, paragraph 2, sentence 3	In the following decade, these <u>this</u> grew by 4.3 percent and 7.0 percent, respectively, sometimes as in more <u>as in more</u> infill or <u>more</u> location-efficient places than in decades prior.”
85.	Clarification	p. 96, column 2, paragraph 1, sentence 2-3	“While the ultimate oversight for this land-use law is the purview of the State Housing and Community Development Department, the allocation methodology was developed and adopted by SCAG’s Regional Council with a clear intent to align regional housing and the climate vision embedded in SCAG’s <u>2020</u> RTP/ SCS. In contrast to past cycles when RHNA followed anticipated future population growth, the majority of the <u>unit need</u> target (836,857) units was allocated to address existing housing need during the 6th cycle.”
86.	Clarification	p. 97, column 1; paragraph 3; sentence 1	“As part of developing a Sustainable Communities Strategy per Senate Bill 375 (SB 375), SCAG must include a “forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies...” will enable SCAG to reach its GHG

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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			emission reduction target of 19 percent below 2005 levels by 2035, <u>if feasible.</u> "
87.	Clarification	p. 97, column 1, paragraph 1, sentence 3	"For SCAG's purposes, this represents a framework for making our <u>jurisdictions cities</u> more inclusive, more equitable and more efficient by providing a range of mobility options and overall reduction in..."
88.	Clarification	p. 97, column 2	<p>Add the consistency language to end of page: "In order to assess the ability of the Connect SoCal 2024 Plan to meet federal air quality standards and achieve a state greenhouse gas reduction target, SCAG creates small-area projections data for housing, population, and employment, which are known as the Tier 2 traffic analysis zone (TAZ) socioeconomic dataset (SED). Although these data are based in part on input provided by staff from local jurisdictions during the Connect SoCal 2024 Local Data Exchange process, local jurisdictions and projects within the region shall not be held to meet any specific numbers within or aggregates of the TAZ data. Connect SoCal 2024's TAZ-level household and employment projections are created to provide estimated snapshots in time. These projections do not reflect subsequently available information (given that local jurisdictions provided their local input to SCAG between May and December 2022); and, concerning some jurisdictions, they also do not reflect all currently entitled and pending projects. Additionally, the TAZ data do not project the full build-out and realization of localities' general plans; and they do not conform to jurisdictions' current respective housing elements. The local plans and approvals have continued and will continue to evolve; and market forces will continue to play a major role in determining the timing, locations, and different types of development and redevelopment that will occur. Therefore, the applicable jurisdiction(s) should be contacted for the most up-to-date data available.</p> <p>The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level.</p> <p>SCAG's forecasted regional development pattern (FRDP) is not solely based on the TAZ-level household and employment spatial projections. It is utilized to estimate the overall effect of the many policies, goals, and strategies of Connect SoCal—which should not be uncritically applied, individually or en masse, to any particular project or plan. The TAZ-level household and employment growth projections support the region's ability to model conformity with federal air quality standards and its ability to achieve a state greenhouse gas reduction target; they do not, however, reflect the only set of growth assumptions that may meet these standards and that target.</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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			<p>Therefore, insofar as housing and other laws or grants may require comparisons of projects or plans to Connect SoCal 2024, SCAG’s projections that are illustrated in TAZ maps—along with any related documents or modeling outputs—may not be used to determine the inconsistency of any plan or project in the region with Connect SoCal 2024. Given that land use decisions are properly made with attention to local contexts and circumstances, local jurisdictions and other lead agencies shall have the sole discretion to determine a local project’s or plan’s general consistency and overall alignment with Connect SoCal.</p> <p>For example, local jurisdictions’ plans and approvals may be found to align with Connect SoCal 2024 if they directionally support a number of its objectives, such as by encouraging a mix of housing types that includes more affordable and multi-family housing rather than solely single-family, for-sale housing; providing for more housing located proximate to employment or vice versa; or encouraging increased use of transit, ridesharing, biking, walking or micro-mobility, or hybrid and remote work to reduce commuting trips. Such alignment is an appropriate basis for a local jurisdiction to determine that a plan or project is consistent with Connect SoCal 2024. Such determinations should be evaluated based on (i) the totality of the goals, policies, and objectives of Connect SoCal 2024 and its associated Program Environmental Impact Report (PEIR), and (ii) the attributes of the local project or plan in overall relation to Connect SoCal, and not in a prescriptive manner by applying SCAG’s TAZ-level data, any aggregate thereof, or any particular one or more goals, policies, or objectives of Connect SoCal 2024 and its associated PEIR.</p> <p>This flows logically from the fact that Connect SoCal 2024 includes dozens of stated directives, policies, goals, objectives, and measurements, any number of which may not be individually applicable to any given project or plan. For example, a project that provides new housing units in conformity with a jurisdiction’s approved housing element can and should be found to be in overall alignment with Connect SoCal 2024 given housing production’s contribution to Connect SoCal 2024 goals and policies, especially those related to affirmatively furthering fair housing, social and economic justice, jobs-housing balance, and the like.</p> <p>Household or employment growth included in the Connect SoCal 2024 TAZ-level SED and maps may assist in determining consistency with the SCS for purposes of determining a project’s eligibility for CEQA streamlining under SB 375 (Cal. Govt. Code § 21155(a)). TAZ-level maps and data may not otherwise be used or applied prescriptively to determine that a project is inconsistent or not in alignment with Connect SoCal 2024 for any purpose, given that myriad other development assumptions could also be found to be consistent or, on balance, aligned with the SCS. Specifically, the TAZ-level data and maps do not supersede or otherwise affect locally approved housing elements, including those adopted in compliance with the 6th Cycle of the Regional Housing Needs Assessment (RHNA).”</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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89.	Clarification	p. 98, map 3.3	<p>Forecasted Regional Development Pattern map shows growth increment of 2019-2050.</p> <ul style="list-style-type: none"> • Why does this show growth instead of Year 2050 densities? • Remove map or Replace map with Year 2050 densities. • If map is kept, add language “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.” • Relabel Freeways to <u>Freeways/Toll Roads</u> • Add “Growth, 2019-2050” to title
90.	Correction	p. 99, column 2, paragraph 1, sentence 1	<p>“The Regional Housing Needs Assessment Allocation process takes place every eight years, as required by state law, or every other RTP/ SCS cycle.”</p>
91.	Clarification	p. 97, column 1, paragraph 1, sentence 3	<p>“PDAs are based on both existing conditions and future infrastructure, meaning that their boundaries reflect a snapshot in time based on data available at the time of Plan development. As such, these boundaries reflect a guide, and the location of PDAs used by local jurisdictions or for various programs or grants may differ.”</p> <ul style="list-style-type: none"> • Sentence unclear. Possibly reword sentence or explain how do the PDA boundaries reflect a snapshot in time. • How do the PDA ‘boundaries reflect a guide’?
92.	Clarification	p. 101, column 1; paragraph 2; last sentence	<p>“As a result, <u>this Plan projects that</u> only 7 percent of the region’s future household growth will be located in SOIs outside of incorporated city boundaries from 2019 to 2050.”</p>
93.	Clarification	p. 102, map 3.4	<ul style="list-style-type: none"> • Add data year to title • The map is not legible; thus, we cannot properly comment on PDA locations. Additionally, explain the “SCAG 2023” derives from.
94.	Clarification	p. 103, column 1, paragraph 3, sentence 2	<p>“Therefore, SCAG’s approach of de-emphasizing growth in areas with the highest number of convergences is sensitive to market considerations, <u>though some growth may still occur.</u>”</p>
95.	Clarification	p. 103, column 2, paragraph 4, sentence 2	<p>“These areas at risk of interface fire losses are referred to by law as “Fire Hazard Severity Zones” (FHSZ).”</p> <ul style="list-style-type: none"> • What are “interface fire losses”?
96.	Clarification	p. 104, column 1, paragraph 2	<p>“Endangered Species and Plants: Location and condition of species of rare and sensitive plants, animals and natural communities in California, <u>see regulatory agencies, such as U.S. Fish and Wildlife .</u>”</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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			<ul style="list-style-type: none"> SCAG should defer to regulatory agencies for definitions and regulations
97.	Clarification	p. 104, column 1, paragraph 4	“Natural Community and Habitat Conservation Plans: (<u>NCCP and HCP</u>) These plans identify and provide for the regional protection of plants...”
98.	Clarification	p. 105, map 3.5	<ul style="list-style-type: none"> Add data year to title Relabel Freeways to <u>Freeways/Toll Roads</u>
99.	Clarification	p. 106, column 1, paragraph 1, sentence 3	“However, we know that alleviating the severity of the housing crisis requires a <u>considerable</u> commiserate commitment of resources.”
100.	Clarification	p. 109, column 1, paragraph 1, sentence 3	“The region must rise to meet the moment by investing in the adequate supporting infrastructure for all vehicle classes.” <ul style="list-style-type: none"> Reword “rise to meet the moment”
101.	Clarification	p. 109, column 1, paragraph 2, sentence 3	“However, both financial, <u>supply</u> , and infrastructure barriers are keeping many people in the region from transitioning to clean transportation.”
102.	Clarification	p. 109, column 1, paragraph 3, sentence 3	“Low-income communities are the most impacted from older-vehicle emissions, and an additional rebate program could serve to both accelerate the transition to cleaner vehicles and ensure that the related health <u>benefits</u> also benefit SCAG’s Priority Equity Communities.”
103.	Clarification	p. 111, column 2, last paragraph, sentence 2	“By investing in a more efficient goods movement network, Universal Basic Mobility and improved access to recreational trails, <u>the SCAG region</u> is not only making broad improvements to the general regional economy but is focusing specifically on areas of disparity...”
104.	Clarification	p. 118, column 1	“49. Promote <u>Implement</u> the Forecasted Regional Development Pattern of Connect SoCal 2024, consisting of household and employment projections that have been reviewed and refined by jurisdictions and stakeholders to advance this shared framework for regional growth management planning”
105.	General comment	p. 119	Climate resilience policies seem to be lacking as far as transportation infrastructure is concerned. Consider policies here that encourage: <ul style="list-style-type: none"> -embedding climate resilience into transportation infrastructure planning and management -transportation infrastructure capital investments and innovation to scale climate resilience -help communities achieve resilience, safety, health, equity and economic vitality
106.	Comment	p. 121, Regional Planning Policy #89 (Tourism)	Encouraging alternative modes of transportation for tourist traveling to the SCAG region does not seem feasible. What other modes of transportation would allow a visitor to easily travel from the airport to the city, to the mountains, to the beach?
107.	Clarification	p. 121, column 1	“81. Promote <u>an increased variety of</u> payment credentials for disadvantaged community members and the transition of cash users to digital payment technologies to address payment barriers” <ul style="list-style-type: none"> What are “payment credentials”?
108.	Clarification	p. 121, column 2	“89. Encourage the reduced use of cars by visitors to the region by working with state, county and city agencies to highlight and increase access to <u>safe</u> alternative options, including transit, passenger rail and active transportation”

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
109.	Clarification	p. 123, column 1; paragraph 1	<p>Add clarification information for the table starting on page 124 by inserting following to page 123’s first paragraph:</p> <p><u>Note that the list of other responsible parties is not exhaustive. The strategies starting on the following page identify areas where SCAG can:</u></p> <ul style="list-style-type: none"> • <u>Lead: SCAG may act as a collaboration leader, advocate on state or federal legislation and/or initiate new research in furtherance of SCAG’s policies and goals. SCAG already has or will begin to move forward on this strategy.</u> • <u>Partner: SCAG may provide technical assistance or grant resources to jurisdictions, agencies, organizations, and other entities in furtherance of SCAG’s policies and goals. Successful implementation of the strategy will depend on other governments, agencies or organizations, and entities. SCAG already has or will begin to move forward on this strategy.</u> • <u>Support: SCAG will provide ongoing support (toolbox Tuesday, provide subject matter expert presentations to elected officials, letters of support in grant applications) to efforts led by other agencies or organizations. While SCAG does not have a direct and tangible role to move forward on this strategy, it remains engaged to provide continued support to advance projects that further SCAG’s policies and goals.</u>
110.	Clarification	p. 124	<ul style="list-style-type: none"> • Add table number and table title • Add asterisk to “Other Responsible Parties*” and display footnote on each page: “List of parties is not exhaustive”
111.	Correction	p. 124	First strategy – consider adding “performance” to “..regional performance targets..”to denote an ongoing process of monitoring and adaptive management.
112.	Revision	p. 124, Mobility, Complete Streets Strategy	Revise the Strategy #4, SCAG should not take the lead in developing a complete streets network.
113.	Clarification	p. 125	Strategy #6. SCAG role, Partner? (Maybe Support?) SCAG has no land use authority, what would SCAG’s role be as Partner.
114.	Clarification	p. 125	Strategy #9. Not clear what this strategy entails
115.	Clarification	p. 125, 128, 129, 132 Table footnote	“* (Asterisks) denote strategies that support quantified GHG emission strategies that help to reach SCAG’s <u>greenhouse gas reduction target set by CARB.</u> ”
116.	Clarification	p. 126	Strategy #3. What’s the purpose of developing more TMAs/TMOs? Is this in areas where none TMA’s exist? Does CTC initiate this?
117.	Correction	p. 127	Strategy #s 5 and 8. Add Transit/Rail Agencies to “Other Responsible Parties” or add an asterisk to say the list of agencies under “Other Responsible Parties” is not exhaustive (unless if others feel its implied)
118.	Clarification	p. 128	Strategy #4. This is the only Strategy under which, “Toll Authorities” are mentioned. How are toll authorities defined?
119.	Clarification	p. 129, line 2 (second item under Priority Development Areas)	<p>“Develop <u>Support</u> housing in areas with existing and planned infrastructure and availability of multimodal options, and where a critical mass of activity can promote location efficiency.”</p> <p>Change from “partner” to “support.”</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
120.	Clarification	p. 129	Strategy #1. SGC under Other Responsible Parties. Define at first use. (Strategic Growth Council)
121.	Clarification	p. 129	Strategy #5, households of color, should this be BIPOC (Black, Indigenous and People of Color)
122.	Clarification	p. 131	Strategy #s 2 and 7 No other responsible parties? Local jurisdictions. Private sector companies?
123.	Clarification	p. 132	Strategy # 1. The strategy is for PPP but Private Sector Companies are not identified in the Other Responsible Parties
124.	Clarification	p. 132	Strategy # 2. The strategy is to assist local jurisdictions, but the SCAG role disposition is "Lead" Consider changing to Support or Partner
125.	General comment	p. 132	Natural and Agricultural Lands Preservation. While part of "natural lands" wetlands, due to their importance in the ecosystem should be called out. For example, ref to "...conserve and restore wetlands , natural and agricultural lands.." [The PEIR defines <i>Natural lands as Biologically diverse landscapes such as forested and mountainous areas, shrub lands, deserts and other ecosystems which contain habitat that supports wildlife and vegetation</i>].
126.	General comment	p. 132	Strategy #6. RAMP VMT mitigation. "Work with implementation agencies to support, establish or supplement <u>elective</u> regional advance mitigation programs (RAMP) for regionally significant transportation projects to mitigate environmental impacts, reduce per-capita VMT and provide mitigation opportunities through the Intergovernmental Review Process"
127.	General comment	p. 132	Strategy #8. Consider rewording to be consistent with Policy #62 on p119, you typically don't restore wildlife corridors. Suggest, "Support the integration of nature-based solutions into implementing agency plans to address urban heat, organic waste reduction, protect and restore wetlands and natural habitats, habitat and wildlife corridor restoration , greenway and wildlife connectivity and similar efforts."
128.	General comment	p. 133	Strategy #2. SCAG role should be Partner/Support since local jurisdictions are responsible for developing their own CAPs
129.	Clarification	p. 134	Strategy #2. Clarify if MSRC is a SCAG committee
130.	Clarification	p. 134	Strategy #8. Who issues the regional/statewide universal permit?
131.	Clarification	p. 135, column 1	"Continue to develop an understanding of low-income travel patterns and needs, and the impact of shocks (e.g., <u>COVID pandemic response</u> and telework adoption) on low-income travel"
132.	Clarification	p. 138	"This chapter ... to meet milestones to implement Connect SoCal <u>2024</u> ."
133.	Clarification	p. 139; all pages	"FIGURE 4.1 FY2024/25–FY2049/50 RTP/SCS Revenues (in Nominal Dollars, Billions)" <ul style="list-style-type: none"> • Add full fiscal year identifiers to clarify the years covered in all figures and references
134.	Clarification	p. 139; all references to SCAG Financial Model 2023	"SCAG <u>Connect SoCal Financial Model 2023</u> <ul style="list-style-type: none"> • Add Connect SoCal reference to sources regarding financial model • P. 150, 154, 155, 156, 171
135.	Clarification	p. 139; Figure 4.2	" <u>Operations and Maintenance (O&M) Transit</u> "
136.	Clarification	p. 135; column 2, sentence 2	"The COVID-19 pandemic <u>response</u> has had a significant impact on travel patterns and economic activity, and..."

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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137.	Clarification	p. 144; Figure 4.3	<ul style="list-style-type: none"> • “FIGURE 4.3 Historical Inflation Trends (<u>Year-Over-Year Annual Inflation</u>)” • Add label “Inflation” to Y-axis • Why is inflation only through 2019? • X-axis only shows to 2018
138.	Clarification	p. 145; Figure 4.4	Add label “Index (2020=100)” to Y-axis
139.	Clarification	p. 146; column 1; paragraph 1; sentence 2	“Suppressed consumer spending during the initial pandemic <u>response</u> period resulted in significant declines in retail sales <u>due to shutdowns in response to the pandemic</u> . Likewise, recessions and economic slowdowns also reduce personal consumption.”
140.	Clarification	p. 146; column 1; paragraph 2; sentence 2	<p>“...Though changes in regional vehicle miles traveled will continue to play a role during the Plan period, increases in conventional fuel efficiency and the adoption of alternative fuel and alternative-powered vehicles will reduce overall fuel consumption.”</p> <ul style="list-style-type: none"> • What is the reference to “regional” vehicle miles traveled?
141.	Clarification	p. 146; column 2; paragraph 3; sentence 1	“At the time of the <u>2024</u> Connect SoCal Plan, three decades have passed without substantive Congressional agreement on a long-term solution...”
142.	Clarification	p. 153; Table 4.2	<ul style="list-style-type: none"> • Replace “Total” with “SCAG Region” at bottom of table. • Add note that fiscal year indicates the date the fiscal year ends • Right-justify all data columns.
143.	Correction	p. 154; column 1; paragraph 1; sentence 2	“The share of state sources (32 percent) is relatively unchanged since the <u>2020 last</u> RTP/SCS.”
144.	Clarification	p. 154; Figure 4.8	<ul style="list-style-type: none"> • Add population share of region into the legend showing the share of revenue.
145.	Clarification	p. 157; column 2; paragraph 1; sentence 5	<p>“... These factors include technology and associated privacy issues, cost of implementation and administrative methods for fee collection/revenue allocation and potential equity concerns.”</p> <ul style="list-style-type: none"> • Add Oxford comma to clarify which statement is accurate: • These factors include technology and associated privacy issues, cost of implementation, and administrative methods for fee collection/revenue allocation and potential equity concerns.” • These factors include technology and associated privacy issues, cost of implementation and administrative methods for fee collection/revenue allocation, and potential equity concerns.”
146.	Clarification	p. 159; column 2; Local Road Charge Program	<p>“Local road charge program assumes a \$0.020 (in 2019 dollars) per mile charge throughout the region that can be implemented on a county basis.”</p> <ul style="list-style-type: none"> • How would this be done for residents vs. visitors?
147.	Correction	p. 160; column 2	<p>“Transportation Development Act (TDA)... Description: The Local Transportation Fund (LTF) is derived from a <u>¼ percent</u> cent sales tax on retail sales statewide.”</p>
148.	Correction	p. 162; column 2; RMRA sentence 2	“Description: The RMRA... Although the RMRA also provides SHOPP funding, for purposes of the <u>2024 2020</u> RTP/SCS financial plan, it only reflects the portion directed to counties and cities.”

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
149.	Clarification	p. 168; column 1; sentence 2	“Efforts are underway to explore transition from our current fuel tax-based system based to a more direct system of road user fees.”
150.	Clarification	p. 174; paragraph 2	“The Connect SoCal 2024 performance monitoring program integrates federal transportation system performance management and Equity/Environmental Justice measures and metrics specific to a set of federal transportation conformity planning, reporting requirements for designated criteria air pollutants and to support the achievement of regional greenhouse gas emissions reduction targets established by the California Air Resources Board.” <ul style="list-style-type: none"> • Sentence is incomplete
151.	Clarification	p. 178; column 4	“ \$1.00 < \$2.00 <u>\$1.00 = \$2.00</u> INVESTMENT BENEFIT \$754 <u>Average</u> Annual Transportation Cost Savings per Household 277,800 <u>Average</u> Annual New Jobs from Transportation Investments 480,100 <u>Average</u> Annual New Jobs from Transportation Investments and Increased Competitiveness”
152.	Clarification	p. 182; paragraph 2; sentence 2	“Improving the region’s mobility and enabling more sustainable development can provide a myriad of co-benefits, including reduced energy and water use.”
153.	Clarification	p. 183; column 2; paragraph 1; sentence 3	“A livable community is defined by a cohesive, <u>physically active</u> and engaged population.”
154.	Clarification	p. 186; column 1; paragraph 2; sentence 3	“However, decreased travel during the shutdowns in response to the COVID-19 pandemic most likely helped the achievement of the 2020 target, so continued effort will be necessary to sustain progress and Plan implementation to reach the 2035 target.”
155.	Clarification	p. 188; column 1; paragraph 2; sentence 2	“The increased competitiveness and improved economic performance created induced by these expenditures will generate an additional 202,300 jobs per year <u>on average</u> due to enhanced network efficiency.”
156.	Clarification	p. 188; column 2; paragraph 1; sentence 2	“The purpose of the Equity Analysis is to evaluate the potential impacts of the implementation of the Plan on communities, including both protected populations, as defined by federal regulation, and priority communities, as identified by SCAG and regional stakeholders. The preparation of the <u>Plan report</u> relied heavily...” <ul style="list-style-type: none"> • Define ‘protected populations’ and ‘priority communities’
157.	Clarification	p. 188; column 2; paragraph 2; sentence 1	“One method SCAG used to determine if the Plan caused disproportionate and adverse impacts to historically marginalized and disadvantaged communities is through the identification and assessment of Priority Equity Communities. <ul style="list-style-type: none"> • Define ‘historically-marginalized community’
158.	Clarification	p. 188; column 2; paragraph 2; last sentence	“For more detail on the methodology used to develop Priority Equity Communities, see the Equity Analysis <u>in Section... or in Technical Report...</u> ”
159.	Clarification	p. 189; Map 5.1	<ul style="list-style-type: none"> • Add year to title • Add note to map: “Priority Equity Communities are census tracts in the SCAG region that have a greater concentration of populations

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
			that have been historically marginalized and are susceptible to inequitable outcomes based on several socioeconomic factors.”
160.	Clarification	p. 191; column 2; line 4	“Number of jobs??? employers??? employments reachable within 15-30 15/30 minutes by automobile and 15-45 15/45 minutes by transit during morning peak period (6 a.m.–9 a.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”
161.	Clarification	p. 191; column 2; line 5	“Number of retail establishments reachable within 15-30 15/30 minutes by automobile and 15-30 15/30 minutes by transit during the midday period (9 a.m.–3 p.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”
162.	Clarification	p. 191; column 3; line 1	“This analysis confirmed <u>the</u> typical patterns that of higher income transit riders tend to ride the train, while lower income transit riders tend to ride the bus. <u>Non-Hispanic</u> Black travelers had the lowest automobile mode share, while Hispanic/Latino and <u>non-Hispanic</u> Asian travelers had the highest. <u>non-Hispanic m</u> Multiracial travelers reported the highest walking and biking mode shares.”
163.	Clarification	p. 191; column 3; line 2	“Results anticipate increases in miles traveled on transit and decreases in miles traveled by auto in accordance with the integrated transportation and land use strategies proposed in Connect SoCal. There are slightly greater decreases in person miles traveled for lower income quintiles and for <u>non-Hispanic Black</u> and <u>non-Hispanic Asian</u> travelers.”
164.	Clarification	p. 191; column 3; line 3	“Results anticipate increases in time spent on transit and decreases in time spent traveling by auto in accordance with the integrated transportation and land use strategies proposed in Connect SoCal. There are slightly greater decreases in person hours traveled for higher income quintiles and for Hispanic/Latino and <u>non-Hispanic White</u> travelers.”
165.	Clarification	p. 191; column 3; line 4	“Access to jobs is expected to improve for the overall population in the region and in Priority Equity Communities, however, there are several decreases in auto access to jobs for specific populations in Priority Equity Communities, including <u>non-Hispanic Black</u> , Hispanic/Latino, the two lowest income quintiles, and households below the Federal Poverty Level, limited-English proficiency population, and zero-vehicle households.”
166.	Clarification	p. 191; column 3; line 5	“Access to shopping is expected to improve for the overall population in the region and in Priority Equity Communities, however, there are slight decreases in auto access for the <u>non-Hispanic Black</u> population and in bicycle access for the Hispanic/Latino population in Priority Equity Communities.”
167.	Clarification	p. 192; column 2; line 1	“Percent of population that can reach a park location within 15-30 15/30 minutes by automobile and 15-30 15/30 minutes by transit during the midday period (9 a.m.–3 p.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”
168.	Clarification	p. 192; column 2; line 2	“Number of schools within 15-30 15/30 minutes by automobile and 15-30 15/30 minutes by transit during morning peak period (6 a.m.–9 a.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”
169.	Clarification	p. 192; column 2; line 3	“Number of health care facilities within 15-30 15/30 minutes by automobile and 15-30 15/30 minutes by transit during the midday period (9 a.m.–3 p.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”
170.	Clarification	p. 192; column 3; line 1	“...The largest decreases are for <u>non-Hispanic</u> Hawaiian-Pacific Islander and <u>non-Hispanic</u> Native American populations where the decrease in auto

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
			access in Priority Equity Communities exceeds the regional change; and for the <u>non-Hispanic</u> Native American population where the decrease in bicycle access in the region exceeds the decrease in Priority Equity Communities. ”
171.	Clarification	p. 192; column 3; line 2	“Access to schools... while transit access decreases for <u>non-Hispanic</u> Black people and zero-vehicle households in the region but increases for the same populations in Priority Equity Communities. ”
172.	Clarification	p. 192; column 3; line 3	“Access to healthcare... except for auto decreases for <u>non-Hispanic</u> Black and Hispanic/Latino populations, all but the highest income quintile, and all other priority populations analyzed in Priority Equity Communities, despite increases at the regional level. ”
173.	General comment	p. 193	The section on “Other Freeway or Expressway” should be expanded to include a detailed coding of the region’s freeway system (mixed-flow lane, auxiliary lane, HOV lane, HOT lane, toll lane, and truck lane, <u>toll roads</u> , etc.)
174.	Clarification	p. 193; column 3; line 3	“Gentrifying neighborhoods and those with high eviction filings had higher percentages of <u>non-Hispanic</u> Black and Hispanic/Latino people...”
175.	Clarification	p. 193; column 3; line 4	“In the base year, there is a higher concentration of low-income <u>people???households???</u> and some people of color in areas adjacent to railroads and railyards, and it is expected that this concentration <u>maycould</u> grow in the Baseline and Plan scenarios. SCAG anticipates nominal Plan impact, and that population changes would generally follow that of the SCAG region.”
176.	Clarification	p. 194; column 3; line 1	“The forecasted growth patterns included in the Plan reduced risks for <u>non-Hispanic</u> Asian households in earthquake zones, nominal changes to existing exposures to sea level rise, wildfires, extreme heat, drought and earthquake hazards. Although impacts from climate-related hazards are not always geographically isolated, overall <u>non-Hispanic</u> White populations reside disproportionately in climate hazard zones.”
177.	Clarification	p. 194; column 3; line 3	“...In 2050, <u>non-Hispanic</u> Asian and foreign-born populations are expected to grow in freeway-adjacent areas, though there are no significant differences with the Plan. Emissions reductions in freeway-adjacent areas are significant compared to the share of the region’s total land area, but the Plan impact is still expected to be more pronounced in the region, compared to the freeway-adjacent areas, including areas that overlap with Priority Development Areas. <u>Non-Hispanic</u> Black...”
178.	Correction	p. 195	Map 4-1. The Toll Roads in Orange County are not Interstate Highways, suggest adding a Toll Roads category or code as Other Freeway
179.	Clarification	p. 195; column 3; line 1	“Increased air passenger demand itself has not resulted in increased aviation noise exposure, as increased air passenger activity but reduced aircraft operations have resulted in reduced aircraft noise.” <ul style="list-style-type: none"> • Sentence is incomplete; please reword
180.	Clarification	p. 195; column 3; line 4	“The Plan is expected to invest a greater proportion into projects that benefit the lowest income quintile, and <u>non-Hispanic</u> White, <u>non-Hispanic</u> Black and people who identify as another race (i.e., <u>non-Hispanic</u> Native American, <u>non-Hispanic</u> Native Hawaiian/Pacific Islander, some other <u>non-Hispanic</u> race alone, and two or more <u>non-Hispanic</u> races) compared to other income quintiles and Hispanic/Latino and <u>non-Hispanic</u> Asian populations.”
181.	Clarification	p. 196; column 3; line 1	“... Taxes that help fund projects in the Plan are expected to fall more heavily on <u>non-Hispanic</u> White and <u>non-Hispanic</u> Asian households.”

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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182.	Clarification	p. 197; column 1; sentence 4	"...Connect SoCal 2024 investments by race and ethnicity are more complicated; the Plan is expected to spend more on projects that <u>non-Hispanic White</u> and <u>non-Hispanic Black</u> people are more likely to use compared to Hispanic/Latino and <u>non-Hispanic Asian</u> travelers."
183.	Clarification	p. 199; column 2	"Active Transportation (<u>AT</u>) – ..."
184.	Clarification	p. 200; column 1	"ADU – Accessory Dwelling Unit – A <u>space, room</u> or set of rooms in a <u>residential unit singlefamily home (and in a single family zone)</u> that has been designated or configured to be used as a separate dwelling unit and has been established by a permit."
185.	General comment	p. 201	The Regional Express Lanes Network discussion should be expanded to include HOT lanes and Toll Roads. Orange County Toll Roads are not categorized as express or HOT lanes, but collect tolls as a means of insuring low-emission, free-flow capacity and funding the construction and operation of the facility. TCA-operated Toll roads integrate with express lane and HOT lane facilities via the common FastTrak technology that allows inter-operability and convenience for drivers
186.	Clarification	p. 202; column 1	"CARB – California Air Resources Board (<u>ARB</u>) – California state..."
187.	Clarification	p. 202; column 2	"CEHD – ... This committee reviews projects, plans and programs of regional significance for consistency and conformity with applicable regional plans." <ul style="list-style-type: none"> The CEHD is responsible for reviewing projects, plans and programs of regional significance for consistency and conformity with applicable regional plans? Is this the responsibility of the TCWG?
188.	Clarification	p. 204; column 1	Add criteria pollutants
189.	Clarification	p. 204; column 2	Add EEC
190.	Clarification	p. 206; column 2	"GIS – Geographic Information System – Mapping software that links information about where things are with information about what things are like. GIS allows users to examine relationships between features. <u>These include those</u> distributed unevenly over space, seeking patterns that may not be apparent without using advanced techniques of query, selection, analysis and display."
191.	Clarification	p. 206; column 2	"Greenfield – Also known as "raw land," land that is privately owned, lacks urban services, has not been previously developed, and is located at the fringe of existing urban areas." <ul style="list-style-type: none"> "and is located at the fringe" or should it be "<u>or and</u> is located at the fringe"? Add where the definition comes from. Could this be publicly owned?
192.	Clarification	p. 207; column 1	"GRRAs – Green Region Resource Areas – Derived from SB 375 statute and Connect SoCal 2020 strategies, GRRAs highlight where future growth is not encouraged by <u>SCAG</u> due to presence of open space, habitats, farmland, and/or sensitivity to natural hazards and a changing climate."
193.	Clarification	p. 207; column 1	"Habitat Connectivity – The <u>extentdegree</u> to which the landscape facilitates animal movement and other ecological flows." <ul style="list-style-type: none"> Add where the definition comes from.

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
194.	Clarification	p. 207; column 2	“Household – A household <u>is a housing unit that is occupied by people and</u> consists of all the people who occupy <u>the a</u> -housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit, such as partners or roomers, is also counted as a household.”
195.	Clarification	p. 208; column 1	“IGR – Intergovernmental Review Process – The review of documents by several governmental agencies to <u>consider</u> ensure consistency of regionally significant local plans, projects and programs with SCAG’s adopted regional plans.”
196.	Clarification	p. 209; column 1	LAFCOLAFCo – Local Agency Formation Commission – Regional service planning agencies of the State of California that exercise regulatory and planning powers. LAFCOLAFCo s regulatory powers are outlined in California Government Code Sections 56375 and 56133.
197.	Clarification	p. 209; column 1	“Livable Communities <u>(LC)</u> – Any...”
198.	Clarification	p. 209; column 2	“Livable Corridors <u>(LC)</u> – Livable...”
199.	Clarification	p. 209; column 2	“MAP-21 – Moving Ahead for Progress in the 21st Century – Signed into law by President Obama on July 6, 2012. Funding surface transportation programs at over \$105 billion for fiscal years <u>ending in</u> (FY) 2013 and 2014, MAP-21 was the first long-term highway authorization enacted since 2005.”
200.	Correction	p. 210; column 1	“Measure A – Revenues generated from Riverside County’s local half- percentent sales tax. Measure D – Revenues generated from Imperial County’s local half- percentent sales tax. Measure I – Revenues generated from San Bernardino County’s local half- percentent sales tax. Measure M – Revenues generated from Orange County’s local half- percentent sales tax. Also refers to Los Angeles County’s local, half- percentent sales tax which was authorized in 2018. Measure R – Revenues generated from Los Angeles County’s local half- percentent sales tax.”
201.	Clarification	p. 211; column 1	“Multifamily Residential – <u>For the purposes of the RTP/SCS, the category of ‘multi-family’ residential units includes townhomes, which are defined by the State of California Department of Finance and the U.S. Census Bureau as single-family homes. The category Connect SoCal refers to as ‘multi-family’ units are attached residences, including apartments, condominiums and townhouses. Multifamily residences are usually served by all utilities, are on paved streets, and are provided with or have access to all urban facilities such as schools, parks, and police and fire stations. Senior citizen apartment buildings are included in these classes. Also included are off-campus university-owned housing and off-campus fraternity/sorority houses.</u> ” <ul style="list-style-type: none"> • Townhomes are single-family homes as defined by the State of California DOF and the U.S. Census Bureau.

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
202.	Clarification	p. 211; column 1	<p>“Natural Lands – Biologically diverse landscapes, such as forested and mountainous areas, shrub lands, deserts and other ecosystems, that contain habitat that supports wildlife and vegetation.”</p> <ul style="list-style-type: none"> • Add where the definition comes from.
203.	Clarification	p. 211; column 2	<p>“NIMBY – Not in My Backyard – The phenomenon where people oppose the location of a development perceived as undesirable (e.g., <u>housing</u>, landfill, freeway expansion) in their own neighborhood, <u>and often</u> but raise no objections of similar developments elsewhere.”</p>
204.	Clarification	p. 213; column 1	<p>“PEC – Priority Equity Communities – (Formerly Environmental Justice Areas, Disadvantaged Communities and Communities of Concern) Census tracts in the SCAG region with a greater concentration of populations that have been historically marginalized and are susceptible to inequitable outcomes based on several socioeconomic factors. *For more information, see the Equity Analysis Technical Report.”</p> <ul style="list-style-type: none"> • Define historically marginalized • Define socioeconomic factors • List source of the definition
205.	Clarification	p. 214; column 1	<p>“Proposition 1A – Passed by <u>California</u> voters in 2006, Proposition 1A...”</p>
206.	Correction	p. 214; column 2	<p>“Proposition A – Revenues generated from Los Angeles County’s local half-percentent sales tax. Los Angeles County has three permanent local sales taxes (Propositions A and C, and Measure M) and one temporary local sales tax (Measure R).</p> <p>Proposition C – Revenues generated from Los Angeles County’s local half-percentent sales tax. Los Angeles County has three permanent local sales taxes (Propositions A and C, and Measure M) and one temporary local sales tax (Measure R).”</p>
207.	Clarification	p. 218; column 2	<p>“Small-Lot Development – A practice that allows for the subdivision of lots located within existing multifamily and commercial zones to develop fee-simple housing. Typically, small lot developments are not required to be part of a homeowner’s association, thus reducing the cost for home buyers.”</p> <ul style="list-style-type: none"> • What is “fee-simple housing”?
208.	Clarification	p. 219; column 1	<p>“Sustainable Development – Sustainable development <i>can support the region to thrive with essential</i> resources that maintain quality of life and a growing economy in the present, such as water, energy and food supply, while also enabling future generations to thrive amidst both forecasted and unforeseen challenges.”</p> <ul style="list-style-type: none"> • Reword beginning of sentence (italics) to provide clarity; are the “essential resources” water, energy, food supply?
209.	Clarification	p. 219; column 2	<p>“TC – Transportation Committee – <u>SCAG Policy</u> Committee used to study problems, programs and other matters that pertain to the regional issues of mobility, air quality, transportation control measures and communications.”</p>
210.	Clarification	p. 220; column 2	<p>“Transportation Equity Zones (<u>TEZs</u>) – Communities across the SCAG region most impacted by transportation-related inequities”</p>
211.	General comment	p. 221	<p>Congestion pricing discussion should include Toll roads and express/HOT lane networks that charge users a fee for travel, but typically offer less congested traffic lanes than nearby freeways and roadways. Reduced congestion</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
			provides improved and more efficient mobility with fewer air pollutants and GHG emissions caused by congestion.
212.	Clarification	p. 221; column 1	<p>“Universal Basic Mobility (<u>UBM</u>)– Programs that provide qualified residents with subsidies for transit and other mobility services.</p> <p>Urban Areas (<u>UZA</u>)– Urban Areas in the SCAG region represent densely developed territory and encompass residential, commercial and other nonresidential urban land uses where population is concentrated over 2,500 people in a given locale.”</p>
213.	Clarification	p. 222; column 1	“Vehicle Revenue Hours – The hours that a public transportation vehicle actually travels while in revenue service. Vehicle revenue hours include layover/recovery time, but exclude deadheading (<u>vehicles not in service and driving without passengers</u>), operator training, vehicle maintenance testing, and school bus and charter services.”
214.	Clarification	p. 227; column 2; last paragraph; last sentence	“Staff gathered input from residents primarily via a survey that provided contextual and educational information. <u>The outreach activities include:</u> ”
215.	Clarification	p. 227; column 2	<p>“Public survey: 3,600+ responses”</p> <ul style="list-style-type: none"> • Please clarify if this is the number of respondents or number of questions answered by respondent providing answer. It is misleading if the answer is the latter and should be clarified.

Table 2. PEIR COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
1.	General Comment	PEIR	General: For an EIR document, is it appropriate to use first-person references (e.g., "our expansive goods movement" or "our region"), or should an EIR, as an information document, exclude such first-person references and use "the SCAG region" or something similar?	LOC 4-25
2.	General Comment	PEIR	GHG Emission Reduction Target: The Draft EIR makes reference throughout the document of the SCAG GHG emission reduction target being "19% below 2005 levels by 2035." Should these references identify that this is a per capita reduction target, to eliminate any potential misunderstanding of the 19% 2035 reduction target equaling the 2005 GHG emissions at the regional level, minus 15% of that regional total level?	LOC 4-26
3.	General Comment	PEIR	Many of the source citations in the GHG Emissions chapter cite sources dated from 2007, 2016 and 2017. What is the protocol for the using up-to-date source references? Are these from prior documents and perhaps need to be updated? Or were they used because the analysis and source material were to relate to the Plan's 2019 Existing Conditions base year?	LOC 4-27
4.	General Comment	PEIR	<u>GHG Emission Reduction Target</u> : The Draft EIR makes reference throughout the document of the SCAG GHG emission reduction target being "19% below 2005 levels by 2035." Should these references identify that this is a <u>per capita</u> reduction target, to eliminate any potential misunderstanding of the 19% 2035 reduction target equaling the 2005	LOC 4-28

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			GHG emissions at the regional level, minus 15% of that regional total level?	LOC 4-28 (cont.)
5.	General Comment	PEIR	Several Implementation Strategies encourage development along HQTAs. However, many areas that are defined as HQTAs don't actually function as HQTAs. For example, headways take much longer than 15 minutes. What will SCAG do to ensure there is actually high-quality transit systems serving areas of increased development?	LOC 4-29
6.	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.	LOC 4-30
7.	General Comment	All pages; tables; figures	Black font on teal background is difficult to read in tables and figures	LOC 4-31
8.	General Comment	All tables	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.	LOC 4-32
9.		ES-4; bullet 3	<p>"Orange County. Orange County covers an area of 799948 square miles. Anaheim is the city with the highest population level in the county, with approximately 347,000 people in 2019. Overall, the county had 3,191,000 residents that year."</p> <ul style="list-style-type: none"> County of Orange Surveyor/Public Works' official information is that OC covers ~799 square miles. This does not include city boundaries that extend approximately 3 miles off the coastline, which is included by the U.S. Census Bureau from which the 948 estimate is cited. Update land totals for Ventura and Los Angeles Counties to remove the ocean census tract area if U.S. Census Bureau geographic information was used <p>Footnote # 2 in ES.4.</p>	LOC 4-33
10.	Transportation Network	ES-5	<p>The inventory of the bus routes mileage on page ES-5 warrants some clarification.</p> <p>Clarify whether the total miles of bus routes includes or excludes the separately listed bullet of express bus lanes miles. Specifically, is the 2,302 miles of express bus lanes a subset of the 33,485 miles of total bus routes listed, or a separate and additive inventory.</p>	LOC 4-34
11.	Land Uses	ES-5	<p>Incorrect, interchangeable use of "households" versus "housing units". <u>Please see revised wording below.</u></p> <p>"The SCAG region is comprised of complex patterns of land uses including residential, commercial/office, industrial, institutional, agricultural, and open space land uses. The region has incredible diversity in its built environment and land use patterns (see Map ES-4, Existing Land Use, below). As of 2019, the SCAG region has a total of approximately 6.5 6.2 million <u>housing units</u> households in its housing stock, with over half of the <u>housing units</u> households having been built before 1980. While 54 percent are single-family homes, 46 percent are <u>attached multifamily</u></p>	LOC 4-35

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			homes—generically referred to as multi-family units for the purposes of <u>Connect SoCal</u> —such as condominiums, townhouses, and apartments. <u>There are about 6.2 million households in the SCAG region (occupied housing units). ...</u> ”	
12.	Land Uses	ES-5	EIR states that the region contains 22 million acres of open space, combined. Included in that designation are military installations and "various private holdings". Are military installations typically included as open space?	LOC 4-36
13.	Clarification	ES-6; paragraph 2; sentence 1	“The Plan was also developed to achieve <u>state</u> targets for greenhouse gas (GHG) emissions reductions...”	LOC 4-37
14.	Clarification	ES-7; footnote; sentence 4	“SCAG used its best efforts to incorporate the RHNA, but the data is inherently incomplete because only 12 of 197 jurisdictions had certified housing elements <u>in May 2022</u> , and some local jurisdictions may not be required to complete rezoning associated with housing elements until October 2024.” <ul style="list-style-type: none"> Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic. 	LOC 4-38
15.	Financial Plan	ES-11; 2-30	EIR states that "Transit-related costs comprise the largest share of O&M costs for the region, totaling approximately \$250 billion." (1) Please refer the reader to the applicable table (Table 2-5, pp. 2-30 and 2-31). (2) Does "transit" include both bus and rail transit? Also, does transit include "passenger rail"? (3) Table 2-5, page 2-31, identifies Transit O&M as \$244.5 billion, in contrast to the \$250 billion cited on page ES-11. Please review and correct.	LOC 4-39
16.	Alternative 1: No Project Transportation Network	ES-12 4-9	Page ES-12 of the EIR states that the Alternative 1: the No Project Alternative includes the first two years of transportation projects in the previously-conforming RTP or FTIP. Other sections of the EIR (e.g., page 4-9) reference that Alternative 1 includes the first year of programmed transportation projects. Review and confirm and make consistent in the EIR document: is it one or two years of transportation programming that is included in Alternative 1?	LOC 4-40
17.	Correction	ES-13; paragraph 2; sentence 1	“As discussed in Chapter 4, Alternatives, the summary comparison for the No Project Alternative, Intensified Land Use Alternative, and the Plan is presented in Error! Reference source not found. 7, Comparison of Significant Adverse Environmental Impacts for Connect” <ul style="list-style-type: none"> Insert missing information 	LOC 4-41
18.	Clarification	ES-15; paragraph 2	Provide a clear statement here to the following effect: All mitigation measure recommendations to project sponsors and agencies are advisory. Lead agencies are responsible for identifying and addressing those measures they deem practical and feasible, or applicable to specific projects. This would remove the need to start every project level	LOC 4-42

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			mitigation by stating, "Project-level mitigation measures can and should be considered by lead agencies as applicable and feasible."	LOC 4-42 (cont.)
19.	Mitigation Measures: Project level	ES-18 to ES-77	The project level mitigation measures use various terminology to allow the Lead Agency to determine if EIR mitigation measures are applicable and reasonable for a project. Phrases used in the EIR include: <ul style="list-style-type: none"> • "as applicable and feasible" • "to the maximum extent practicable" * "wherever practicable and feasible" * "wherever feasible" 	LOC 4-43
20.	Mitigation Measures: Project level	ES-18 to ES-77	The project level mitigation measures use various terminology to allow the Lead Agency to determine if EIR mitigation measures are applicable and reasonable for a project. Phrases used in the EIR include: <ul style="list-style-type: none"> • "as applicable and feasible" • "to the maximum extent practicable" * "wherever practicable and feasible" * "wherever feasible" <p>a) Make the reference consistent in phrasing across all project-level mitigation measures.</p> <p>b) Apply said phrasing to all the project-level mitigation measures.</p>	LOC 4-44
21.	Mitigation Measures: Project level	ES-18 to ES-77	Many of the mitigation measures seem to reference policies, procedures, best practices, and documents from other agencies (e.g., Caltrans, air districts, etc.). <p>a) When referencing other agency documents (such as PMM-AQ-1(i) that references Caltrans' Standard Specifications 10-Dust Control, 17-Watering and 18: Dust Palliative), is it better to just reference that a project should consider applicable Caltrans and other agency specifications, rather than detailing the specific reference documents, which may be amended over time and the references could have the potential to be outdated over the four years of the RTP/SCS Plan?</p> <p>b) Many of the mitigation measures contain an extensive inventory of "best practices" from other agencies. Where does one establish a line as to what constitutes a "best practice" versus a "mitigation measure"? Would many of these other agency "best practices" that are inventoried in the mitigation measures, be duplicative of comments that are received by the Lead Agency from said agencies, as part of an environmental review process of a specific project, or in conjunction with applying for a permit? What is the appropriate level of detail of other agency requirements that should be listed in the EIR, especially as mitigation measures?</p>	LOC 4-45
22.	Mitigation Measures: PMM-AES-1	ES-18	To address aesthetic impacts, MM PMM-AES-1 (c) includes language that the Lead Agency "Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas."	LOC 4-46
			How would this emphasis on maintaining consistency with the surrounding area's dominant landscaping, conflict with efforts to support drought tolerant landscaping? There are other efforts already being conducted by local jurisdictions and county transportation commissions,	

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			which fund the removal of non-drought tolerant landscaping and replace it with drought tolerant landscaping as well as water conserving irrigation systems. How should the mitigation measure be amended, to best address potentially conflicting objectives between aesthetics and drought-tolerance?	LOC 4-46 (cont.)
23.	Mitigation Measures: PMM-AES-2	ES-19	To address existing visual character and public views, MM PMM-AES-2 references Lead Agency measures such as developing design guidelines for projects, to make elements of proposed buildings and facilities visually compatible or to minimize the visibility of changes. While one recognizes that the proposed mitigation measure does emphasize that the application of the Mitigation Measure is <i>as applicable and feasible</i> by the Lead Agency, there lacks a sensitivity or recognition that for some residential projects, the looks, mass, height and general character of ministerial and by-right projects will not be negotiable between a Lead Agency and a project developer.	LOC 4-47
24.	Mitigation Measures: SMM-AG-3	ES-21	To address farmland preservation, MM SMM-AG-3 references SCAG's development of the Greenprint web-based tool. a) The mitigation measure should identify that the Greenprint Tool is an <u>elective</u> tool for local jurisdictions and county transportation commissions. b) As referenced in the mitigation measure, is "scenario visualization" a component of the Greenprint Tool, with the current recommended directive that the Tool start small? c) Propose that the mitigation measure language be revised as follows: "... to support local jurisdictions and transportation agencies make better <u>informed</u> land use and transportation infrastructure decisions....".	LOC 4-48
25.	Clarification	Table ES-3; ES-24	"PMM-AQ-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, <u>where applicable and feasible</u> . Such measures may include the following or other comparable measures identified by the lead agency:"	LOC 4-49
26.	Mitigation Measures: PMM-AQ-1: Enhanced Filtration Units	ES-26 ES-27	Mitigation Measure PMM-AQ-1(z) includes an extensive inventory of enhanced air filters monitoring, inspection and maintenance program, for projects located with 500 feet of freeways and other sources. The last element of the program requires the Lead Agency to "Develop a process for evaluating the effectiveness of the enhanced filtration units." This last element seems to bring into question whether the enhanced air filters are effective, while nonetheless recommending a series of actions relating to their installation. Please clarify and appropriately re-word.	LOC 4-50
27.	Mitigation Measures: PMM-AQ-1: Title 24 Building Code	ES-28	Mitigation Measure PMM-AQ-1(cc) states that a Lead Agency "Promote energy efficiency and exceed Title-24 Building Code Envelope Energy Efficiency Standards (California Building Standards Code). Clarify the appropriateness of a mitigation measure that seeks a Lead Agency to ask for exceeding state code requirements.	LOC 4-51

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
28.	Mitigation Measures: PMM-AQ-1: Construction Period	ES-29	Mitigation Measure PMM-AQ-1(ee) states that a Lead Agency should consider whether to "Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time." Is this a recommended practice that is currently in place? Please clarify how the construction period would be lengthened? Is this to extend the construction period (e.g. hours) during the day, or <u>how many the number of days</u> of the week when construction could occur, or to ask a developer to take a longer amount of time to develop the project? Is this a realistic ask?	LOC 4-52
29.	Clarification	Table ES-3; ES-30	"PMM-AQ-2 For pProjects subject to California Environmental Quality Act (CEQA) review (i.e., non-exempt projects) and located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and within one-quarter mile (1,320 feet) of a sensitive land use, <u>project leads, as applicable and feasible, should</u> shall prepare an air quality analysis that evaluates potential localized project air quality impacts in conformance with SCAQMD methodology for assessing localized significance thresholds (LST) air quality impacts. If air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the project <u>should</u> shall incorporate feasible mitigation measures to reduce air pollutant emissions."	LOC 4-53
30.	Clarification	Table ES-3; ES-30-31	"PMM-BIO-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the 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, and species that meet the definition of "rare" as defined in CEQA Guidelines Section 15380(b)(2), <u>where applicable and feasible.</u> "	LOC 4-54
31.	Clarification	Table ES-3; ES-32	"PMM-BIO-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, <u>where applicable and feasible.</u> Such measures may include the following or other comparable measures identified by the lead agency:"	LOC 4-55
32.	Mitigation Measures: PMM-BIO-3: In-lieu fees vs in kind services	ES-34	Mitigation Measure PMM-BIO-3() states that wetlands compensatory mitigation can include "Contribution of in-kind in-lieu fees." Is this an error and perhaps should read "Contribution of in-kind services or in-lieu fees"? In-kind typically refers to the payment of goods or services, as opposed to monies.	LOC 4-56
33.	Clarification	Table ES-3; ES-34	"PMM-BIO-3 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, <u>where applicable and feasible.</u> "	LOC 4-57
34.	Clarification	Table ES-3; ES-35	"PMM-BIO-4 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can	LOC 4-58

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible.</u> "	LOC 4-58 (cont.)
35.	Mitigation Measures: PMM-BIO-4: Open space/nursery site areas	ES-37	Mitigation Measure PMM-BIO-4(p) identifies that where an RTP/SCS or other regionally significant project has the "potential to impact other open space or nursery site areas, " that compensatory coverage should be sought. The mitigation measure should clarify what is "other open space". Also, the reference to "nursery site areas" should be expanded to reference what type of nursery site area is governed by this mitigation measure. All plant nurseries, including commercial nurseries? And how would this address wildlife movement, which is the emphasis of the mitigation measure?	LOC 4-59
36.	Mitigation Measures: PMM-BIO-4: Corridor Redundancy	ES-38	Mitigation Measure PMM-BIO-4(v) identifies that one comparable measure to address wildlife movement impacts, is to "Create corridor redundancy to help retain functional connectivity and resilience." The mitigation measure should include clarification on exactly what type of corridor redundancy is being recommended, to avoid confusion between a transportation corridor versus a wildlife or other corridor that the mitigation measure is addressing.	LOC 4-60
37.	Clarification	Table ES-3; ES-38	"PMM-BIO-5 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible.</u> "	LOC 4-61
38.	Mitigation Measures: PMM-BIO-4: Tree Removal Timing	ES-39	Mitigation Measure PMM-BIO-5(h) identifies that debris to be removed as a result of tree removal work should be done within two weeks of debris creation. Recommend that the timing also include the phrase "or as determined by the local jurisdiction", to allow for compliance with any local agency requirements or timing needs.	LOC 4-62
39.	Clarification	Table ES-3; ES-40	"PMM-BIO-6 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible.</u> "	
40.	Clarification	Table ES-3; ES-40	"PMM-CUL-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible.</u> "	LOC 4-63
41.	Clarification	Table ES-3; ES-43	"PMM-CUL-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible.</u> "	
42.	Clarification	Table ES-3; ES-44	"PMM-GEO-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider, <u>where applicable and feasible,</u> mitigation measures	

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
			to minimize the potential for adverse effects associated with surface fault rupture, seismic ground shaking, seismic-related ground failure, liquefaction, and landslides for projects located on sites with unusual geologic conditions, the following measures <u>should</u> shall be considered:"
43.	Clarification	Table ES-3; ES-45	"PMM-GEO-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to geological impacts, <u>where applicable and feasible.</u> "
44.	Clarification	Table ES-3; ES-46	"PMM-GEO-3 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, <u>where applicable and feasible.</u> "
45.	Clarification	Table ES-3; ES-47	"PMM-GHG-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, <u>where applicable and feasible.</u> "
46.	Mitigation Measures: PMM-GHG-1: EV	ES-48 ES-49	To promote GHG reduction, Mitigation Measure PMM-GHG-1(a)(ix), 1(j)iv and (l) promote electric vehicle infrastructure. Is the draft EIR solely promoting electric vehicle infrastructure, or should these references also include other alternative-fueled infrastructure, such as hydrogen? Also please see other minor comments on MM PMM-GHG-1 in the attached scanned document.
47.	Mitigation Measures: SMM-LU-1: Siting New Facilities	ES-60	Mitigation Measure SMM-LU-1 requires SCAG to work with agencies and jurisdictions "when siting new facilities in residential areas...". Does this reference apply to new facilities related to transportation, such as new roads and freeways? If so, please include this clarifier, to prevent any misunderstanding on the types of new facilities the mitigation is supposed to address.
48.	Clarification	Table ES-3; ES-60	"PMM-HYD-4 ...Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. In areas affected by coastal flooding, new projects should be designed for resilience <u>against with</u> 3.5 feet of sea-level rise, as per California Ocean Protection Council's strategic guidance."
49.	Clarification	Table ES-3; ES-64	"PMM-NOI-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, <u>where applicable and feasible.</u> "
50.	Mitigation Measures: PMM-POP-1	ES-66	Impact PPO-2 identifies that proposed Mitigation Measure PMM-POP-1 is to address the displacement of existing people and housing. PMM-POP-1(a) also includes a reference to the impacts of businesses on transportation route alignments. Please clarify if this mitigation measure is to apply to both existing homes and businesses, and if so, make the project impact and mitigation measure consistent in applicability.

LOC 4-63
(cont.)

LOC 4-64

LOC 4-65

LOC 4-66

LOC 4-67

LOC 4-68

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			Mitigation Measure PMM-WF-2 requires a designated fire watch staff during project construction to reduce hazards. How effective would this be in actuality? Suggest removing.	LOC 4-68 (cont.)
51.	Clarification	Table ES-3; ES-70	<p>“PMM-TRA-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts, <u>where applicable and feasible</u>. Such measures may include the following or other comparable measures identified by the lead agency:</p> <p>☐ For future land use development projects, lead agencies should<u>shall</u> encourage the incorporation of transit, bicycle, pedestrian, and micro-mobility facilities, features, and services”</p>	LOC 4-69
52.	Mitigation Measures: PMM-TRA-2 FHWA Document Reference	ES-71	Mitigation Measure PMM-TRA-2 addresses the consideration of TDM strategies in land use and transportation projects and plans. Said mitigation measure references, as guidance, an FHWA 2012 desk reference. Is 2012 the most current iteration of the document, and if so, has the document been reviewed to determine if it is up-to-date and relevant, with current technologies, strategies and trends?	LOC 4-70
53.	Clarification	Table ES-3; ES-71	“PMM-TRA-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts, <u>where applicable and feasible</u> .”	
54.	Clarification	Table ES-3; ES-71	“PMM-TRA-3 <u>A lead agency for a project should, where applicable and feasible, prepare</u> a sight distance analysis as needed for locations where sight lines could be impeded. The sight distance analysis to be prepared according to the jurisdiction’s applicable Municipal Code requirements and the Caltrans Highway Design Manual (HCM) standards and guidelines, and should recommend safety improvements as appropriate such as limited use areas (e.g., low-height landscaping), and on-street parking restrictions (e.g., red curb), and any turning restrictions (e.g., right-in/right-out).”	LOC 4-71
55.	Clarification	Table ES-3; ES-72	“PMM-TCR-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, <u>where applicable and feasible</u> .”	
56.	Clarification	Table ES-3; ES-73	“PMM-UTIL-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the 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.”	LOC 4-72

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
57.	Mitigation Measures: PMM-UTIL-3	ES-75	Mitigation Measure PMM-UTIL-3 focuses on the reduction of solid waste. There are several references about developing opportunities to divert food waste from landfills. Perhaps there should be a reference to SB 1383, which is already law, and focus the emphasis on strengthening versus developing opportunities to divert food waste? <ul style="list-style-type: none"> • Think about removing J or rewording ordinance encouragement 	LOC 4-73
58.	Clarification	Map ES-1	<ul style="list-style-type: none"> • Add page number • Add label for Orange County 	LOC 4-74
59.	Clarification	Map ES-2	<ul style="list-style-type: none"> • Add page number • Add label for Orange County • Change source to SCAG • Map ES-2 illustrates 16 subregions in the Legend, but page ES-4 states there are 15 subregions in SCAG. Please review and correct inconsistency. • The legend color used for Orange County and SANBAG is almost identical. Is there any opportunity to change the color choice, especially since Orange County and San Bernardino County share a border? 	LOC 4-75
60.	Regional Location	ES-4; Map ES-2	EIR states that "the SCAG region consists of 15 subregional entities...". However, the referenced Map ES-2 illustrates 16 subregions. Please review and make consistent.	LOC 4-76
61.	Clarification	Map ES-3	<ul style="list-style-type: none"> • Add page number • Reduce thickness of city boundary lines 	LOC 4-77
62.	Clarification	Map ES-4	<ul style="list-style-type: none"> • Add page number • Add year to title • Add note specifying land use categories were standardized by SCAG. 	LOC 4-78
63.	Clarification	p. ES-92; Map ES-5	<ul style="list-style-type: none"> • Add page number • Add language to map and/or map page <p>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”</p>	LOC 4-79
64.	Clarification	Map ES-6	<ul style="list-style-type: none"> • Add page number • Add year to title • Change legend’s “Freeway” to “Freeway/Toll Road” 	LOC 4-80

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
65.	Clarification	Map ES-7	<ul style="list-style-type: none"> Add page number 	LOC 4-81
66.	Clarification	p. 1-2; paragraph 3; sentence 6	<p>“...SCAG developed the LDX process to engage local jurisdictions partners and get information needed to fulfill state planning requirements.”</p>	LOC 4-82
67.	Correction	p. 1-8; paragraph 3; sentence 2	<p>“... Drafting an EIR [...] necessarily involves some degree of forecasting (CEQA Guidelines Section 15144).”</p> <ul style="list-style-type: none"> Insert the missing reference information 	LOC 4-83
68.	Clarification	p. 1-14; paragraph 2; sentence 1	<p>“In addition, the 2024 PEIR identifies project-level mitigation measures for lead agencies to consider which they “can and should” <u>consider for adoption</u> adopt, as applicable and feasible, in subsequent project-specific design, CEQA review, and decision-making processes.”</p>	LOC 4-84
69.	Clarification	p. 1-15; paragraph 2; sentence 5	<p>“The notices notice are published in English, Spanish, Korean, Chinese, and Vietnamese languages. The Draft Connect SoCal 2024 <u>documents</u> are posted on the SCAG website and virtually distributed to libraries throughout the region, and physically distributed to libraries upon request.”</p>	LOC 4-85
70.	Clarification	p. 1-18; Table 1-3	<ul style="list-style-type: none"> Add horizontal lines between rows to make information easier to read 	LOC 4-86
71.	Clarification	p. 2-6; paragraph 4; last sentence	<p>“Additionally, some local jurisdictions may not be required to complete rezonings associated with housing element updates until October 2024, rendering data on newly available sites inherently incomplete (or unavailable) for the purposes of Connect SoCal 2024.”</p> <ul style="list-style-type: none"> Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic. 	LOC 4-87
72.	Clarification	p. 2-7; paragraph 3; last sentence	<p>“As noted above, Connect SoCal 2024 utilized the LDX process to solicit land use and growth input directly from SCAG’s local jurisdictions, and the Plan is the first RTP/SCS prepared by SCAG that did not modify <u>the requested local data inputs of housing and employment.</u>”</p>	LOC 4-88
73.	Correction	p. 2-8; bullet 3	<p>“Orange County. Orange County covers an area of 799948 square miles. Anaheim is the city with the highest population level in the county, with approximately 347,000 people in 2019. Overall, the county had 3,191,000 residents that year.”</p> <ul style="list-style-type: none"> County of Orange Surveyor/Public Works’ official information is that OC covers ~799 square miles from the coastline inland. This does not include city boundaries that extend approximately 3 miles off the coastline, which is included by the U.S. Census Bureau from which the 948 estimate is cited. Density calculations using 948 should be redone using the 799 square miles that does not include the ocean area. Update land totals for Ventura and Los Angeles Counties to remove the ocean census tract area if U.S. Census Bureau geographic information was used 	LOC 4-89
74.	Clarification	p. 2-8; Section 2.4.2; bullet 1	<p>“40 miles of heavy and light rail”</p> <ul style="list-style-type: none"> There are only 40 miles of heavy & light rail in the region? 	LOC 4-90

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
75.	Clarification	p. 2-9; paragraph 1; sentence 4	<p>“While 64 percent are single-family homes, 36 percent are multifamily homes such as condominiums, townhouses, and apartments.”</p> <ul style="list-style-type: none"> • Townhomes are single-family attached homes as defined by the State of California DOF and the U.S. Census Bureau. • Perhaps add language that says “For the purposes of the RTP/SCS, the category of “multi-family” is a short-hand reference for housing units other than single-family detached housing units. These include attached housing units, such as townhomes, which are single-family attached units; condominiums; and apartments.” 	LOC 4-91
76.	Clarification	p. 2-9; paragraph 2; sentence 4-5	<p>“... Much of the open space in the region has been left in its natural state, however many non-native species have transformed what was once native habitat. As of 2018, about half of California has been mapped and classified according to this standard; much of southern California has not yet been classified (CDFW 2023).”</p> <ul style="list-style-type: none"> • Clarify “this standard” 	LOC 4-92
77.	Clarification	p. 2-9; paragraph 3;	<p>“More than 20 million acres of open space within the SCAG region is currently conserved protected under a Habitat Conservation Plan or Natural Community Conservation Plan or will be protected by a future conservation plan that is currently in its planning stages. Data from CDFW and USFWS show 31 plans with durations of 16–80 years providing conservation efforts nearly 3 million acres in the SCAG region. These plans identify and provide for the regional protection of plants, animals and their habitats, while allowing compatible and appropriate economic activity.”</p> <ul style="list-style-type: none"> • Please cite sources of data and clarify numbers and language; is this additive or exclusive? 	LOC 4-93
78.	Clarification	p. 2-12; footnote; sentence 4	<p>“SCAG used its best efforts to incorporate the RHNA, but the data is inherently incomplete because only 12 of 197 jurisdictions had certified housing elements, and some local jurisdictions may not be required to complete rezoning associated with housing elements until October 2024.”</p> <ul style="list-style-type: none"> • Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic. 	LOC 4-94
79.	Clarification	p. 2-13; paragraph 2; sentence 1	<p>“SCAG has the opportunity to analyze and address the inequities that the <u>public</u>, <u>government</u>, and planning profession have created by systemically driving and perpetuating societal differences along racial lines.”</p> <ul style="list-style-type: none"> • Planners and government are not the only parties responsible 	LOC 4-95
80.	Clarification	p. 2-13; paragraph 3; last sentence	<p>“This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces and conserve the region’s resource areas.”</p> <ul style="list-style-type: none"> • Clarify “if fully realized” 	LOC 4-96
81.	Clarification	p. 2-13; bullet 1; sentence 2	<p>“Transit Priority Areas (TPAs). ...Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands.”</p>	LOC 4-97

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			<ul style="list-style-type: none"> Clarify how and explain the assets TPAs can reinforce 	LOC 4-97
82.	Clarification	Table 2-2;	<ul style="list-style-type: none"> All goals should have same language as in Connect SoCal main report. 	(cont.)
83.	Clarification	Table 2-2; p. 2-18	<p>“6. Support implementation of complete streets improvements in Priority Equity Communities*, and particularly with respect to Transportation Equity Zones*, to enhance mobility, safety, and access to opportunities.”</p> <ul style="list-style-type: none"> Missing footnote for * 	
84.	Correction	Table 2-2; p. 2-19	<p>“15. Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the existing transportation system instead of adding roadway capacity, <u>where possible.</u></p> <p>16. Prioritize transportation investments that increase travel time reliability, including build-out of the regional express lanes network.”</p> <ul style="list-style-type: none"> Language is not consistent with Connect SoCal 	
85.	Clarification	Table 2-2; p. 2-19	<p>“22. Reduce<u>Eliminate</u> transportation-related fatalities and serious injuries on the regional multimodal transportation system.”</p>	LOC 4-98
86.	Addition	Table 2-2; p. 2-20	<p>Add new 42. <u>Support a mix of housing types throughout the region; including single-family detached development, which can increase equity-building opportunities for all income levels.</u></p>	
87.	Correction	Table 2-2; p. 2-22	<p>“73. Advance comprehensive systems-level planning of corridor/supply chain operational strategies <u>that is</u>, integrated with road and rail infrastructure, and inland port concepts.”</p> <ul style="list-style-type: none"> Reword to match Connect SoCal p. 120 	
88.	Correction	Table 2-2; p. 2-22	<p>“79. Promote an atmosphere <u>that</u> which allows for healthy competition and innovative solutions <u>which are speed-driven</u>, while remaining technologically neutral”</p> <ul style="list-style-type: none"> Reword to match Connect SoCal p. 120 	
89.	Clarification	Table 2-2; p. 2-23	<p>“89. Encourage the reduced use of cars by visitors to the region by working with state, county, and city agencies to highlight and increase access to <u>safe</u> alternative options, including transit, passenger rail, and active transportation.”</p>	
90.	Clarification	Map 2-1	<ul style="list-style-type: none"> Add page number Add label for Orange County Change source to SCAG 	LOC 4-99
91.	Clarification	Map 2-2	<ul style="list-style-type: none"> Add page number Add label for Orange County Change source to SCAG 	LOC 4-100
92.	Clarification	Map 2-3	<ul style="list-style-type: none"> Add page number Bus routes and freeways are hard to differentiate 	LOC 4-101
93.	Clarification	Map 2-5	<ul style="list-style-type: none"> Add page number Add year to title 	LOC 4-102
94.	Clarification	Map 2-6	<ul style="list-style-type: none"> Add page number Why only major airports? 	LOC 4-103
95.	Clarification	Map 2-7	<ul style="list-style-type: none"> Add page number Add year to title 	LOC 4-104

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none"> Add note specifying land use categories were standardized by SCAG.
96.	Clarification	p. 2-42 Map 2-8	<ul style="list-style-type: none"> Add page number Add year to title Add language to map and/or map page <p>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”</p>
97.	Clarification	Map 2-9	<ul style="list-style-type: none"> Add page number Add year to title
98.	Clarification	Map 2-10	<ul style="list-style-type: none"> Add page number Add year to title
99.	Clarification	Map 2-11	<ul style="list-style-type: none"> Add page number Add year to title
100.	Clarification	Map 2-12	<ul style="list-style-type: none"> Add page number Add city boundaries to legend
101.	Clarification	p. 2-47	<p>“<u>U.S. Census Bureau American Community Survey 2017 1-Year Estimates, American FactFinder. 2017. 2017 Population Estimates.</u> https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml. Accessed July 29, 2019.”</p>
102.	Correction	p. 3-5; paragraph 5; sentence 3	<p>“<u>The regional growth forecast process incorporates extensive input and data including the most up-to-date local land use information, policy responses, demographic...</u>”</p>
103.	Clarification	p. 3-5; footnote	<p>“SCAG’s regional growth forecasting process emphasized the participation of local jurisdictions and other stakeholders. The Local Data Exchange (LDX) process was used to give local jurisdiction’s <u>jurisdictions</u> the opportunity to provide input related to land use and the future growth of employment and households to ensure that the most updated information from local jurisdictions was gathered to link and align local planning with a regional plan that can meet federal and state requirements and reflect a regional vision. Therefore, LDX was a key component of allocation of growth across jurisdictions in the SCAG region with 67% of jurisdictions providing information as part of the LDX process. <u>The deadline for local jurisdiction in the LDX process was December 2022.</u>”</p>

LOC 4-104
(cont.)

LOC
4-105

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4-106

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4-107

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4-108

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4-109

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			<ul style="list-style-type: none"> Who are the “other stakeholders”? Did the public or other groups have input into the growth forecast? Does this refer to the panel of experts? 	LOC 4-109 (cont.)
104.	Existing Conditions	3.8-3	<p>The draft EIR states that "By 1850, the world emitted a cumulative total of approximately 4.76 billion tons of CO2 and by 2019, the world emitted a cumulative total of approximately 1.39 trillion tons of CO2 (estimated from 1750 onward....").</p> <p>Is the reference to 1750 the Year 1750? Also, should there be a citation that identifies how this base level of GHG emissions (i.e., year 1750) was established and quantified?</p>	LOC 4-110
105.	Existing Conditions	3.8-7	<p>The draft EIR states "Furthermore, the global average temperature for July 2023 was the highest on record for the last 120,000 years where the months estimated to have been around 1.5 degrees Celsius warmer than the average for 1815 to 1900...".</p> <p>a) Is the reference to 120,000 years correct? b) The use of the word "months" seems to be an incorrect reference. Please review and correct.</p>	LOC 4-111
106.	Existing Conditions	3.8-7	<p>The draft EIR states "The Safeguarding California Plan was updated in 2018 to present new policy recommendations and provide a road map of all the actions and next steps...".</p> <p>Is the Safeguarding California Plan supposed to be updated every three years? Has the State developed an updated list of policy recommendations and implementation actions that should also be referenced in this section? Or is the approach to keep the discussion to the 2018 California Plan, because of the emphasis on Existing Conditions?</p>	LOC 4-112
107.	Existing Conditions: SCAG Region	3.8-10 3.8-57 3.8-59	<p>In the second paragraph to this section, please re-review and re-check the Table numbers, table titles, and percentage (for Imperial County assigned to transportation GHG emissions), and correct, as appropriate. For example, the title referenced in this paragraph for Table 3.8-7 does not match the title actually assigned to Table 3.8-7 on page 3.8-57. Also, there are references to county-level GHG data that are not in Table 3.8-7 (is it supposed to be Table 3.8-10 on page 3.8-59?). Further, there is a reference to Imperial County generating, in 2019, 1.7% of the region's total transportation GHG emissions, which is not illustrated in any applicable county table of data.</p>	LOC 4-113
108.	Regulatory Framework: Orange County	3.8-42	<p>The section on Orange County's regulatory framework for GHG reductions cites a 2023 Orange County Register source on Orange County moving "forward with developing a county climate action plan to address ways the county could help slow climate change and mitigate the local effect."</p> <p>Please confirm and identify the agency/agencies in charge of developing an Orange County climate action plan.</p>	LOC 4-114

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
109.	Table 3.8-6: Jurisdictions Addressing Climate Change	3.8-44	Having two distinct listings of jurisdictions from distinct counties on the same page, with said listings extending into multiple pages, was initially confusing in Table 3.8-6.	LOC 4-115
110.	Transportation Emissions: OGV	3.8-58 3.8-59	Please include the acronym OGV in the EIR Glossary.	LOC 4-116
111.	SB 743 and VMT Guidance	3.8-65	This section of the draft EIR states "At the time of preparing this 2024 EIR it is unknown how CARB and the other state agencies, through statewide programs or in coordination with local and regional governments, would meet the identified higher VMT reductions. " Please include a short summary of what the higher SB 743 VMT targets are, to prevent the reader from having to research and understand the degree of context.	LOC 4-117
112.	Mitigation Measures: GHG	3.8-66 to 3.8-69	Please see comments, proposed revisions and edits from the draft EIR Executive Summary, Table ES-3: Summary of Project Impacts, Mitigation Measures and Residual Impacts, relating to the GHG mitigation measures (pages ES-47 through ES-50), and carry over to Chapter 3.	LOC 4-118
113.	3.11.1: Environmental Setting Definitions: Recreation	3.11-2	Definition of "recreation". Please identify if recreation areas include both public and private-owned parks and open space areas. As an example, private parks and open space can satisfy local parks requirements for residential developments, with ownership of said private parks and open space by homeowner associations.	LOC 4-119
114.	3.11.1: Environmental Setting Definitions: Subregion	3.11-2 Map ES-2 ES-4	Definition of "subregion". Map ES-2 illustrates 16 subregions in the map Legend, but page ES-4 (of the Executive Summary) and page 3.11-2 of this chapter state there are 15 subregions in the SCAG region. Please review and correct inconsistency.	LOC 4-120
115.	3.11.1: Environmental Setting Definitions: Vacant Land Existing Land Uses	3.11-3	Definition of "vacant land" is described in this chapter as land that "is generally referred to land with no buildings on it." Please clarify if the designation of vacant land includes land with no buildings on it, but with improvements such as surface parking lots. This issue has come up in local jurisdiction review of parcel level existing land uses and how to appropriately classify such land uses. Perhaps the inclusion of the term "undeveloped" or "no improvements", as are used in the narrative on vacant lands on page 3.11-3, would be of benefit.	LOC 4-121
116.	Clarification	p. 3.11-5; paragraph 1	"The SCAG region is composed of six counties: Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The Plan's policies and strategies encourage improvement in the jobs-housing balance by focusing new housing and employment in Priority Development Areas (PDAs). A general discussion of the land use patterns is provided for each of the six SCAG counties below <u>and is sourced from each County government's General Plan.</u> "	LOC 4-122
117.	3.11.1: Environmental Setting Counties: Orange	3.11-5; paragraph 6	"Between 2000 and 2019, the total population of Orange County increased by 12.1 percent, which was slightly higher than the SCAG region increase of 14 percent. The <u>County of Orange's General Plan</u>	LOC 4-123

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			<p>assessed that Orange County would experience a steady but declining amount of land available for development."</p> <ul style="list-style-type: none"> Please re-check the numbers. The percentages comparison and the conclusion do not match. 	LOC 4-123 (cont.)
118.	Clarification	p. 3.11-6	<p>"San Bernardino. Between 2000 and 2019, the total county population increased by 27.2 percent (U.S. Census Bureau 2002; SCAG 2021, 2023a); well above the SCAG <u>regional region</u> increase of 14 percent (SCAG 2021, 2023a). Much of the development in San Bernardino has occurred on unincorporated county land. The <u>County of San Bernardino's</u> General Plan..."</p>	LOC 4-124
119.	3.11.1: Environmental Setting Counties: Ventura	3.11-6	<p>In the discussion of Ventura County, this chapter states "Between 2000 and 2019, Ventura County's population growth increase of 12.8 percent was slightly higher than the SCAG region increase of 14 percent."</p> <ul style="list-style-type: none"> Please re-check the numbers. The percentages comparison and the conclusion do not match. 	LOC 4-125
120.	Clarification	p. 3.11-8; paragraph 2; sentence 6	<p>"City and county general plans must be consistent with each other. Local jurisdictions implement their general plans through zoning ordinances. Zoning ordinances provide a much greater level of detail including the general plan land use designations and such information as permitted uses, yard setbacks, and uses that would require a conditional use permit (Map 3.11-1, General Plan Land Use Designations, shows the general land use designations (consolidated for purposes of consistency and mapping) for the six SCAG member counties and 191 cities in the SCAG region)."</p> <ul style="list-style-type: none"> "City and county general plans must be consistent with each other." This statement is not accurate. Delete. 	LOC 4-126
121.	Clarification	p. 3.11-8; paragraph 3&4	<p>"The land use elements of the county and city general plans within the SCAG region generally classify lands into in to 35 land use categories (Table 3.11-2, SCAG Region General Land Use Categories).</p> <p>According to <u>modeling results of the SPM data</u>, the Plan would add approximately 50,000 urbanized acres to the region by 2050 (SCAG 2023c)."</p>	LOC 4-127
122.	3.11.1: Environmental Setting Existing Land Uses by County	3.11-8	<p>In the discussion of existing land uses by county, this chapter states "According to SPM data, the Plan would add approximately 50,000 urbanized acres to the region by 2050."</p> <p>To avoid any misinterpretation of the 50,000 acres comprising new acreage being added to the region, perhaps the verb "add" could be revised to explain that the Plan incorporates land use changes to existing acreage (i.e., through infill or redevelopment, in addition to greenfield development)?</p>	LOC 4-128
123.	3.11.1: Environmental Setting Existing Land Uses by County Table 3.11-2	3.11-8; Table 3.11-2	<p>In the discussion of existing land uses by county, this chapter states "The 35 land uses noted in Table 3.11-2 are grouped into three Land Development Categories (LDCs) to describe the general conditions in a given area, including urban, compact and standard LDCs". In reviewing Table 3.11-2, there seems to be a mismatch between the narrative on page 3.11-8 and the presentation of information on Table 3.11-2. As an example, Table 3.11-2 seems to list 34 land uses. There also does not seem to be any correlation between LDC designations and Table 3.11-2,</p>	LOC 4-129

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			which is implied in the narrative. Perhaps clarify in the narrative on page 3.11-8 that the LDC grouping is a subsequent process.	LOC 4-129 (cont.)
124.	Clarification	3.11-10; paragraph 3	<p>“The majority of medium- and high-density housing in the region is found in the urban core of the region, in Downtown Los Angeles, East Los Angeles, the South Bay, and the “West Side” of Los Angeles. Large cities, such as Long Beach, Santa Ana, Glendale, Oxnard, and Pasadena, also have concentrations of high-density development in their downtown areas. Several beach communities, such as the Cities of Santa Monica, Manhattan Beach, Hermosa Beach, Redondo Beach, Huntington Beach, and Newport Beach, have high density close to the ocean.”</p> <ul style="list-style-type: none"> • Define ‘high-density’ • If density calculations were made using the Census Bureau geographic boundaries, which include ocean areas for coastal cities, the density calculations may need to be redone. 	LOC 4-130
125.	Clarification	3.11-11; paragraph 3	<p>“<u>Multifamily units—a term that SCAG uses to generally classify homes other than single-family detached housing units—are attached residences, apartments, condominiums, and also include townhouses, which are classified by the State and U.S. Census Bureau as single-family attached homes.</u>”</p>	LOC 4-131
126.	Clarification	3.11-11; paragraph 5	<p>“Duplexes, Triplexes, and 2- or 3-Unit Condominiums and Townhouses. This category is composed of duplexes, triplexes, and 2- or 3-unit condominiums, <u>which are all multi-family structures and townhouses— which are actually attached single-family units</u>that are attached multifamily structures.”</p>	LOC 4-132
127.	Clarification	3.11-11; paragraph 8	<p>“Typically, low-rise apartments, <u>and condominiums, and townhouses</u> occur together in large contiguous areas since land use is restricted to multi-family zoned areas.”</p> <ul style="list-style-type: none"> • Townhomes are single-family housing units. 	LOC 4-133
128.	Correction	3.11-12; paragraphs 1 & 3	<p>“Medium-Rise Apartments and Condominiums. This category includes multi-family structures of three to four stories and <u>greater than >18 units/acre....</u></p> <p>High-Rise Apartments and Condominiums. This category includes multi-family structures of five stories or greater and <u>greater than >18 units/acre.</u>”</p>	LOC 4-134
129.	Clarification	3.11-14; paragraph 3	<p>“OPEN SPACE, RECREATION, AND AGRICULTURAL LAND USES... In yet other instances, lands may be designated or zoned as open space but still allow for development of a single-family home. Lands evaluated as natural lands in the Plan are generally evaluated as wildlife habitat in Section 3.4, Biological Resources, and not agricultural lands. In general, in this 2024 PEIR, agricultural lands are farmlands, and natural lands provide valued habitat.”</p> <ul style="list-style-type: none"> • Some land that is currently used for agriculture is zoned for other purposes but is temporarily being used for agriculture and the long-term expectation is that the land will be developed for housing or commercial. Please clarify in the narrative whether land classification is by use or by zoning and update any calculations as applicable. 	LOC 4-135

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
130.	Clarification	3.11-16-17; Table 3.11-4	Use full name of Source in tables instead of acronyms. "Source: <u>California Coastal Commission CCC 2019</u> " and add link to source website	LOC 4-136
131.	Clarification	3.11-21; paragraph 4	"The California Coastal Act constitutes the California Coastal Management Program for the purposes of the Federal Coastal Zone Management Act (California Coastal Act of 1976; PRC Section 30000 et seq.). The act established the <u>California Coastal Commission (CCC)</u> , identified a designated California Coastal Zone, and established CCC's responsibility to include the preparation and ongoing oversight of a Coastal Plan for the protection and management of the Coastal Zone. Each local jurisdictional authority (city or county) with lands within the coastal zone is required to develop, and comply with, a coastal management plan. The Coastal Act requires that any person or public agency proposing development within the Coastal Zone obtain a <u>Coastal Development Permit (CDP)</u> ..."	LOC 4-137
132.	Clarification	3.11-21; bullet 1	"a) The project is in a transit priority area;" <ul style="list-style-type: none"> List source and define transit priority area even if defined in a previous chapter 	LOC 4-138
133.	3.11.1: Environmental Setting Sustainable Communities and Climate Protection Act	3.11-24; paragraph 2	Page 3.11-24, second paragraph, discusses the interrelationship between RHNA and the regional transportation plan processes. This section states "The RHNA, which is developed after the regional transportation plan, must also allocate housing units within the region consistent with the forecasted regional development pattern included in the SCS." <ul style="list-style-type: none"> Is this an accurate statement relating to SCAG's RHNA and Connect SoCal planning processes? 	LOC 4-139
134.	Clarification	3.11-24; paragraph 2	"Previously, the RHNA determination was based on population projections produced by DOF. SB 375 requires the determination to be based upon population projections by DOF and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted used in the regional transportation plan is within a range of <u>1.5 three</u> percent of the regional population forecast completed by DOF for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than <u>1.5 three</u> percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by DOF. <u>Though SCAG's total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG's population projections from the applicable 2020 Connect SoCal Plan for the 6th Cycle of RHNA.</u>	LOC 4-140
135.	Mitigation Measures: SMM-LU-1	3.11-28	Mitigation Measure SMM-LU-1 states that SCAG shall work with the region's county transportation commissions and Caltrans in the siting of new <u>transportation</u> facilities in residential areas, to minimize future impacts to established communities. Is there any need or value to also	LOC 4-141

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			referencing the Transportation Corridor Agencies in this mitigation measure? Also recommend that <u>transportation</u> be added to the mitigation measure language, to confirm what is implied intent.	LOC 4-141 (cont.)
136.	Clarification	3.11-33; Map 3.11-1	<ul style="list-style-type: none"> • Add page number • Source year should be 2019 not 2016 • Add data year to title • Add link to where land use definitions are • Explain if these are the consolidated land use categories and not the original jurisdiction maps 	LOC 4-142
137.	Clarification	3.14-1; Bullet list	“Employment: <u>Also known as “jobs”, employment includes both wage and salary workers and self-employed workers. Paid, wage and salary</u> employment consists of full- and part-time employees, including salaried officers and executives of corporations, who were on the payroll in the pay period. Included are employees on sick leave, holidays, and vacations; not included are proprietors and partners of unincorporated businesses.”	LOC 4-143
138.	Clarification	3.14-1; Bullet list	“Housing unit: A house, an apartment or other group of rooms, or a single room are regarded as housing units when occupied or intended for occupancy as separate living quarters. <u>These include single-family and multi-family units as well as accessory dwelling units (ADUs).</u> Different jurisdictions have slightly different definitions of what constitutes a housing unit.”	LOC 4-144
139.	Clarification	3.14-1; Bullet list	“Population: As used in this analysis, population is data available from the U.S. Census <u>Bureau</u> for the SCAG region for the period of 1900 through 2022 <u>2019</u> and from the State Department of Finance, with population projections available from SCAG in 2023 for the projected population growth through 2050.”	LOC 4-145
140.	Clarification	3.14-2; paragraph 2; sentence 5	“Historically, population within the SCAG region was heavily influenced by net migration, or the difference between people coming into an area (immigrating) and the people leaving an area (emigrating) as opposed to <u>natural</u> the increase, <u>which is the number</u> of births over deaths. However, since about 2000, net migration has slowed and has resulted in slower population growth across the SCAG”	LOC 4-146
141.	Clarification	3.14-2; paragraph 3; sentence 3	“The change is largely attributed to four key factors: (1) lower birth rates (fewer children), (2) lower immigration rates (fewer immigrants, <u>both domestic and international</u>), (3) aging population (fewer at childbearing age), and (4) high housing costs (lack of housing) (SCAG 2023a).	LOC 4-147
142.	Clarification	3.14-2; Table 3.14-1	Change rates in table to display in percentages instead of raw number, e.g., use 22.6% instead of 0.226 as seen in Table 3.14-7.	LOC 4-148
143.	Clarification	3.14-3; paragraph 2; last sentence	“At a fundamental level, there is simply not enough housing for everyone who wants to live <u>on their own</u> in the state.”	LOC 4-149
144.	Correction	3.14-4; Table 3.14-3 source	“Connect SoCal 2024 base year, based on 2020 <u>U.S. Decennial Census P.L. 94-171 Redistricting data</u> PL-94 redistricting file and 2019 DOF E-5 estimates”	LOC 4-150
145.	Correction	3.14-4; Table 3.14-4 source	“4. U.S. Census <u>Bureau</u> 2020 , American Community Survey <u>2020</u> 1-year estimates, <u>Table B17001</u> ”	LOC 4-151

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			<p>5. U.S. Census Bureau 2021, American Community Survey <u>2021</u> 1-year estimates, <u>Table S1701</u></p> <p>Verify if these are rates (raw number instead of displaying as a percent) or if they are rates per another population number, e.g., per 1,000 people.</p> <p>If raw numbers, change rates in table to display in percentages instead of raw number, e.g., use 23.8% instead of 0.238 as seen in Table 3.14-7</p> <p>Update title and add notes as needed to clarify.</p>	LOC 4-151 (cont.)
146.	Clarification	3.14-7 & 8; Tables 8-10	Ensure totals match data in main RTP report	LOC 4-152
147.	Clarification	3.14-11; paragraph 3; sentence 2	“At the time of preliminary <u>Plan</u> forecast development (April 2022) only 12 of the region’s 197 jurisdictions had 6th cycle housing elements which had been adopted and certified by the state.”	LOC 4-153
148.	Clarification	3.14-13; paragraph 2; last sentence	“In addition, decisions made regarding the building and expansion of transportation systems divided communities of color and primarily benefited <u>non-Hispanic White</u> white suburban commuters.”	LOC 4-154
149.	Clarification	3.14-16; paragraph 2; sentence 3	<p>“In accordance with SB 197, zoning must be updated to reflect the 6th cycle RHNA by October 2025.”</p> <ul style="list-style-type: none"> • October 2025 date is inconsistent with other dates of October 2024 listed throughout documents • Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic. 	LOC 4-155
150.	Clarification	3.14-16; Table 3.14-11	<ul style="list-style-type: none"> • Title “Summary of Housing Goals by County <u>Governments</u> in the SCAG Region” • Header: County and City Policies and Ordinances [Note: these are pulled from the Counties’ General Plans and not cities] • Change listing of 6 counties to • <u>County of Imperial</u> • <u>County of Los Angeles</u> • <u>County of Orange</u> • <u>County of Riverside</u> • <u>County of San Bernardino</u> • <u>County of Ventura</u> 	LOC 4-156
151.	Clarification	3.14-22; paragraph 2; sentence 2	“However, transit <u>stations</u> station are generally located in areas that are already developed <u>or</u> where growth is planned and desirable.”	LOC 4-157
152.	Clarification	3.14-22; paragraph 4; sentence 1	“As discussed above and in Chapter 2, Project Description, the Plan’s <u>forecasted</u> forecast regional development pattern provides for a projected population distribution that could occur in 2050. The total SCAG region population is expected to increase by approximately 1.3 million persons by 2050. The Regional Planning Policies and Implementation Strategies included in the Plan would encourage growth in PDAs and <u>reduce</u> minimize growth in GRRAs.”	LOC 4-158

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
153.	Clarification	3.14-22; paragraph 7; sentence 1	Please clarify if this is referring to accommodating growth in PDAs and if the housing reference is also to growth. Consider revising to: “Implementation of the Plan would accommodate <u>a majority 60.4 percent of the region’s future population-growth in PDAs: 60.4 percent of the population growth</u> , 61.2 percent of the <u>household growth, region’s future housing units</u> , and 64.8 percent of <u>the future employment growth in PDAs</u> (SCAG 2023d).”	LOC 4-159
154.	Clarification	3.14-23	“SMM-POP-1 SCAG shall continue to facilitate collaboration forums, such as through SCAG’s <u>Working Housing Group</u> ...”	LOC 4-160
155.	Clarification	3.14-24; paragraph 6; sentence 1	“In urban areas, redevelopment often has the potential to displace affordable housing and can disproportionately affect people of color, particularly <u>non-Hispanic Black</u> and <u>non-Hispanic Indigenous</u> populations.”	LOC 4-161
156.	Clarification	3.14-28; Map 3.14-1	<ul style="list-style-type: none"> • Add page number 	LOC 4-162
157.	Clarification	3.14-29; Map 3.14-2	<ul style="list-style-type: none"> • Add page number • Add language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.” 	LOC 4-163
158.	Clarification	3.14-30; Map 3.14-3	<ul style="list-style-type: none"> • Add page number • Add language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require 	LOC 4-164

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”	LOC 4-164 (cont.)
159.	Clarification	4-5; paragraph 1; sentence 2	“As a result, Connect SoCal 2024 is SCAG’s first RTP/SCS to not modify local data inputs <u>for housing and employment.</u> ”	LOC 4-165
160.	Clarification	4-6; paragraph 1; sentence 2	“Key components include a forecasted regional development pattern based on expert projection, existing planning documents, <u>and</u> regional policies, and review by local jurisdiction through the year 2050, as well as a transportation network including a list of transportation projects and investments from CTCs on their planned near-term and long-term projects.”	LOC 4-166
161.	Section 4.3.2: Plan Elements: Transportation Elements: Work from Home	4-7	This section discusses and defines Work from Home. Please clarify if SCAG’s definition of Work from Home applies both to full-time and part-time employees in SCAG’s activities-based, travel demand model. Also, is there any estimate of the percentage of Work from Home employees that is assumed in the SCAG modeling?	LOC 4-167
162.	Section 4.4.1: Alternative 1: Transportation Element	4-9 ES-12	The Alternative 1 transportation network is described as including the first year of the previously conforming FTIP. However, in the Executive Summary of the Draft EIR, the Alternative 1 transportation network is defined as including the first two years of transportation projects in the previously-conforming RTP or FTIP. Please review and correct.	LOC 4-168
163.	Section 4.5: Comparison of Alternatives: Alternative 1: Aesthetics	4-12	This section of the Alternative 1 analysis states that "The No Project Alternative would not include any transportation projects that could affect State Scenic Highways or vista points. Has there been a specific review of the Alternative 1 transportation project list to confirm this statement?"	LOC 4-169
164.	Section 4.5: Comparison of Alternatives: Alternative 1: Agriculture and Forestry Resources	4-13	This section of the Alternative 1 analysis states that under the Alternative 1: No Build/No Project scenario, that "The potential for conflicts with zoning land use designations, Williamson Act contracts, and/or other applicable regulations that protect agricultural and forestry resources and timberlands would also be less because fewer agricultural lands would be converted to nonagricultural uses than under the Plan." Please re-review and verify if this statement is correct. If all the EIR Alternatives share the identical growth projections in population, households and employment, and if the Plan emphasizes infill development and a lesser impact on greenfield development, how would the No Build Scenario have a lesser impact on agriculture lands conversion to developed uses?	LOC 4-170
165.	Clarification	4-14; paragraph 3; sentence 3	“For example, Segment 1 is in El Centro on the I-8; under the Plan, the segment would experience a decrease in VMT from light- and medium-duty cars of approximately 1,400 as compared to the No Project; however, heavy-duty truck traffic is expected to increase by over 200 daily trips under the Plan as compared to the No Project scenario. Since the majority of DPM (<u>diesel particulate matter</u>) emissions and the associated health risk results from heavy-duty vehicles, the health risk would be greater in this segment under the Plan. The health risk under the Plan is anticipated to be less in most segments as compared to the No	LOC 4-171

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			Project scenario. The total health risk summed across the analyzed segments under the Plan (1,553 in 1 million <u>people</u>) would be less than the No Project (1,575 in 1 million)." <ul style="list-style-type: none"> Please clarify the 1,400 reference 	LOC 4-171 (cont.)
166.	Comparative Discussion of EIR Alternatives	4-17 4-19 4-24	Especially within the same paragraph of EIR discussion, there are instances where the same EIR Alternative is given different terminology, which makes for a very confusing read for the reader to understand the differences, if any. As an example, on page 4-17 and page 4-24, Alternative 1 is called the No Project Alternative, the No Plan, and the No Plan Alternative. Also, on page 4-19 and 4-24, the Plan is termed both The Plan and Connect SoCal 2024. It would be ideal if the same terminology could be used within the same paragraph to avoid initial confusion.	LOC 4-172
167.	Clarification	4-19; paragraph 4	SCAG Natural Lands Conservation Areas- what are these?	LOC 4-173
168.	Clarification	4-21; paragraph 1	"Alternative would result in greater impacts related to the wasteful, inefficient, or unnecessary consumption of energy during construction activities and long-term operations and impacts would remain significant."	LOC 4-174
169.	Clarification	4-21; paragraph 4	Add definition of "seiche" even if already included in previous chapter	LOC 4-175
170.	Clarification	4-22; paragraph 4; sentence 4	"The same is true for existing requirements and regulations addressing potential safety hazards and excessive noise within an airport land use plan or within two miles of a public or public- use airport, so airport-related safety and noise impacts to people residing or working in the Plan area would be the same under this alternative." <ul style="list-style-type: none"> What is the difference between public and public-use airport? 	LOC 4-176
171.	Clarification	4-22; footnote & p. 4-35	"Airport Ground Support <u>Equipment</u> (GSE) sources"	LOC 4-177
172.	Clarification	4-22; last paragraph; last sentence 4-36	"Therefore, the more dispersed land use pattern of this alternative and lack of transportation system improvements would result in greater impacts associated with emergency access <u>along with</u> and emergency response and evacuation plans, and impacts would be significant." Please clarify the listings within the sentence.	LOC 4-178
173.	Section 4.5: Comparison of Alternatives: Alternative 1: Population and Housing	4-25	This section of the Alternative 1 analysis states that under the Alternative 1: No Build/No Project scenario, that "the lack of large-scale transportation projects under this alternative would also reduce the potential" for right-of-way acquisition that would lead to potential displacement of existing housing and affected populations. Has the list of programmed FTIP projects in Alternative 1 been reviewed to confirm this statement?	LOC 4-179
174.	Clarification	4-25; paragraph 2	"The No Project Alternative assumes a more dispersed growth pattern, which may result in less pressure to redevelop existing sites, <u>and therefore</u> and that are the result in induce direct population growth by	LOC 4-180

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
			encouraging new residential and commercial development within more rural or suburban settings where such growth may not have been planned.	LOC 4-180 (cont.)
175.	Section 4.5: Comparison of Alternatives: Alternative 1: Transportation	4-29	This section of the Alternative 1 analysis states that under the Alternative 1: No Build/No Project scenario, that "impacts related to design hazards for transportation projects would be greater , as fewer transportation projects that meet current design standards would be constructed and the Plan's focus on safety would not be implemented. " Would this categorical statement be accurate? Is not safety still a requirement for the Connect SoCal 2020 projects that are programmed and included in Alternative 1?	LOC 4-181
176.	Clarification	All pages; 4-31; Agriculture and Forestry Resources; e.g. 5-3	Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years. Add notes to language and table or figures that indicate " not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming." Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.	LOC 4-182
177.	Clarification	4-34;	"This alternative would result in less <u>fewer</u> impacts related to the wasteful , inefficient, or unnecessary consumption of energy during construction activities and long-term operations."	LOC 4-183
178.	Clarification	4-40; paragraph 6	"The performance comparison for the <u>alternatives</u> No-Project Alternatives and the Plan is included in the Connected SoCal 2025 Land Use and Community Technical Report."	LOC 4-184
179.	Terminology	5-3 5-6	Page 5-3, Air Quality section, references the "Southern California Air Quality Management District (SCAQMD). Please correct as the " <i>South Coast</i> Air Quality Management District. Page 5-6, Wildfire section, references the need to discourage development in PGAs. In the Glossary, a PGA is defined as "Peak Ground Acceleration." Should the reference be PDA (Priority Development Area)?	LOC 4-185
180.	Clarification	5-3	Agriculture and Forestry Resources section discusses land converted to non-agricultural use. Please clarify if the land is zoned for agriculture or being used temporarily with agriculture uses but zoned as another use.	LOC 4-186

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION	
181.	Clarification	5-4	“Energy: Implementation of the Plan has the potential to result in wasteful, inefficient, or unnecessary energy consumption in the SCAG region.”	LOC 4-187
182.	Clarification	5-4	<p>“Greenhouse Gas Emissions (GHG): ...Furthermore, while GHG emissions are anticipated to decrease compared to existing conditions, they are not anticipated to be reduced sufficiently to meet the statewide GHG emissions reduction targets and GHG emissions resulting directly and indirectly from the Plan may result in significant and unavoidable impacts.”</p> <ul style="list-style-type: none"> • Please clarify the reference to decreasing emissions [as of when] compared to existing conditions. • Reword second part of sentence to clarify the state as a whole isn’t meeting the state-level targets even though SCAG has met the state-prescribed target. 	LOC 4-188
183.	Clarification	5-8; Paragraph 2	<p>“However, construction activities related to transportation projects and land use development would nevertheless result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment and aggregate supply used in construction.”</p> <ul style="list-style-type: none"> • Clarify what “fuel oil” is. 	LOC 4-189
184.	Section 5.3: Growth Inducing Impacts	5-10	This section, paragraph 6, page 5-10, states that the Plan does not plan “...for anything more than nominal or by-right growth in rural areas...”, in addition to more efficient, compact growth in existing developed areas. Please confirm that the received Local Input from SCAG jurisdictions confirms the statement of there being nominal or by-right growth in rural areas, in the Plan.	LOC 4-190
185.	Clarification	5-11; paragraph 1; last sentence	“However, the improved accessibility from the Plan’s transportation projects, transit investments, and land use strategies could also facilitate population and economic growth in areas of the region that are currently not developed, despite policies designed to discourage hibit such development.”	LOC 4-191

Table 3. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add “2024” to all technical report page headers’ titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
8	General Comment	All pages	Extra commas throughout . . . Example, page 15, 2 nd paragraph, last sentence
9	Correction	p. 11	1 st paragraph, there appears to be an unnecessary quotation mark before “on airport property...”
10	Correction	p. 11	3 rd paragraph, second line, there appears to be an unnecessary parenthesis
11	Clarification	p. 12	2 nd paragraph, spell out Imperial County Airport (IPL)
12	Clarification	p. 20	3 rd paragraph. Should “Approximately 88 percent of travelers at LAX are O&D, and 22 percent are connecting passengers” be modified to add up to only 100%? Right now the total is 110%.
13	Clarification	p. 22	2 nd paragraph, last sentence add “Region” to “Impact of COVID-19 on air passenger and cargo activity in the SCAG”
14	Correction	p. 33	2 nd paragraph, extra parenthesis after NPIAS
15	Correction	p. 52	Last paragraph, delete “go” or “reach” in “economic impacts of airports go reach outside airport property”
16	Clarification	p. 58	3 rd bullet point, is there an extra “ground” in “airport ground airside ground”?
17	Correction	p. 70	Second sentence, delete “from” in “...employees will also access from the region’s airports...”
18	General Comment	p. 74	Should SCAG be studying airport operations? Or surface transportation? Should the aviation technical report conclude that SCAG will study surface transportation interplay with aviation, rather than conclude SCAG will study airport planning?
19	Clarification	Table 7	Explain why the Santa Ana airport is the only airport where truck trips decrease in 2050

Table 4. CONGESTION MANAGEMENT TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add “2024” to all technical report page headers’ titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.

Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific technical report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.
2	General Comment	All maps with growth forecast and development types data	Add language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”
3	General Comment	All pages	Add “Technical Report” and “2024” to the header of each page
4	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
5	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
6	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
7	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
8	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
9	General Comment	All pages	Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency’s legal

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION		
			boundary, otherwise known as “Spheres of Influence” the growth must be feasible		
10	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.		
11	Clarification	All pages	<p>Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>		
12	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”		
13	Define	Add Glossary	Add glossary to technical report and define: ACS BLS DPH EDD GRRRA Headship rates	LDX LED NAICS Overcrowding/rates PDA People of color PopSyn	PUMS QWI racial/ethnic groups Sketch-planning sustainability p. 28 SWAA WFH
14	Clarification	p. 5; paragraph 5; sentence 2	“Long-range growth in an entire region, or within individual neighborhoods, cannot be <u>specifically</u> predicted; however, probabilistically it is usually more likely to be nearer to the middle of a range than to the extremes.”		
15	Clarification	p. 7; paragraph 2; sentence 1	“Between March and November 2022, SCAG staff initiated and completed one-on-one meetings with 164 of the region’s 197 local jurisdictions to explain the methods and assumptions behind the preliminary small-area growth forecast, as well as to provide an opportunity to review, edit and approve data the provided maps as well as and provide jurisdiction and TAZ totals for households and employment in 2019, 2035, and 2050.”		

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			Note: jurisdictions were not asked to approve maps—they were asked to approve data illustrated in map format.
16	Clarification	p. 7; paragraph 3; sentence 2	Remove or provide definition of “overcrowding rates”.
17	Clarification	p. 7; paragraph 4; sentence 2	“In order to meet the <u>greenhouse gas targets set by CARB</u> and implement the policies of Connect SoCal, these projections must be regionally balanced.”
18	Clarification	p. 7; Table 2	<ul style="list-style-type: none"> • Add grey section header bar above SCAG Region HIOC row. • Bold SCAG region total rows
19	Clarification	p. 8; paragraph 1; last sentence	<p>“These county-level projections provide a starting point for an even better balanced vision of 2050 which will require more policies, strategies, and investments in order to achieve.”</p> <p>Please clarify sources and responsible parties of policies mentioned.</p>
20	Clarification	p. 8; paragraph 2; sentence 1	“According to Census 2020, which is the <u>most recent</u> official count of record, the population of the SCAG region as of April 1, 2020 was 18,824,382.”
21	Clarification	p. 9; Figure 3	Change source wording to “U.S. Census Bureau Decennial Census P.L.94-171 downloaded from IPUMS NHGIS, University of Minnesota”
22	Clarification	p. 10; Figure 4	Change and vary color and format of lines to better differentiate between all.
23	Clarification	p. 10; paragraph 1	“While population decline is unprecedented in <u>California</u> , a substantial portion can...”
24	Define	p. 13; paragraph 3	Please provide definition of “people of color”.
25	Clarification	p. 13; paragraph 3; sentences 2-3	“Rooted in historically and spatially embedded inequities, indicators such as household overcrowding and exposure to pollutants are typically higher for people of color; because Because of the markedly younger age structure for people of color, <u>more</u> children will <u>also</u> be disproportionately impacted by this regional inequity .”
26	Clarification	p. 13; paragraph 4; sentence 2	“The groups whose share of the region are projected to grow by 2050 are (in descending order) <u>non-Hispanic Asian</u> , <u>non-Hispanic Multiracial</u> , <u>non-Hispanic Native Hawaiian/Pacific Islander</u> , and <u>Hispanic/Latino</u> (Table 45).”
27	Correction	p. 14; Figure 3.1.3	Shading of Baby Boomers should be much darker shade of blue or white/hollow.
28	Clarification	p. 15; paragraph 2; sentence 2	“This trend is nonlinear over the projection <u>period horizon</u> . By 2035, Baby Boomers will be ages 75 and older, Generation X will be at or approaching <u>their senior years retirement age (65 years+)</u> , and Millennials and Gen Z will be in prime working age <u>(16-64 years)</u> but both will have aged out of prime childbearing age <u>(generally 15-44 years)</u> .”
29	Clarification	p. 15; paragraph 3; last sentence	“By 2022 regional employment had also matched its 2019 pre-COVID peak—which was 447,000 jobs greater than at the 2016 base year of the last Connect SoCal plan (Figure Table 7).”
30	Clarification	p. 15; Figure 6	<ul style="list-style-type: none"> • Add descriptors of “Housing Units” and “Household Size” to vertical/Y axis on Figure 6. • Lighten color for Single-Family Units as it is difficult to differentiate.

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none"> Change title “Figure 6. New Housing Units <u>Permitted</u> and Average Household Size, SCAG Region, 2000-2022” Change source “Source: CA DOF E-5 and <u>Permits: Construction Industry Research Board New Units from Permits. Household Size: CA DOF E-5 January 1 Estimates.</u> *2019 household size uses SCAG Growth Forecast in lieu of DOF to benchmark to Census 2020.
31	Clarification	p. 16; table 5	Define “headship by age”.
32	Clarification	p. 16; paragraph 2; last sentence	“Due to aging alone, the number of households would be expected to increase by more than 26 percent, compared with 11 percent population <u>overall growth.</u> ”
33	Clarification	p. 16; paragraph 4	“Household sizes tend to increase in the years following low housing production. Housing production was especially low over 2008-2013 as a result of the Great Recession—household sizes plateaued at around 3.1 and began to decline precipitously thereafter. This is related to the population growth slowdown coupled with relatively robust housing production, in addition to new Census 2020 data indicating more housing units in the region than were previously known to exist— <u>likely due to better canvassing of neighborhoods and identification of new or non-permitted structures and conversions.</u> ”
34	Clarification	p. 16; paragraph 6; sentence 2 sentence 3	<p>“The 53,745 new units <u>permitted</u> in the region in 2022 reflect a higher number of new units than at any single year since 2006. <u>The higher number of units permitted is due in part to the increased in These data likely undercount</u> accessory dwelling unit (ADU) production. <u>A</u>—a newly available data series from the Department of Housing and Community Development show a rapid rise <u>of ADUs</u> in the region in recent years and over 11,000 ADUs in 2021. <u>This suggests that total new unit construction in recent years is likely even higher than shown in Figure 6.</u>”</p> <ul style="list-style-type: none"> Please clarify if 53,745 new units are referring to the number of units permitted or units completed. If using CIRB data, it is likely permits issued not units that completed construction. Why would the data undercount ADUs and why is new unit construction higher? Is this referring to permitting or completed units or legal/permitted units vs. non-permitted units? Is CIRB is questioning whether jurisdictions are reporting permits for new ADUs and permits for legalizing non-permitted ADUs?
35	Correction	p. 18; Figure 8; paragraph 1 sentence 2	<p>“Between 2016 and 2019, employment was growing and the P:E ratio declined (Figure 78-B).”</p> <p>Recommend relabeling Figure 8 to Figure 8-A and Figure 8-B.</p>
36	Correction	p. 20; paragraph 1	“Since 2000, SCAG region <u>regional</u> employment in the following four sectors...”
37	Correction	p. 21; paragraph 2	“In constant 2022 dollars, the median wage in the SCAG region was \$23.23 in 2002, \$22.88 in 2012, and \$22.87 in 2022. Table 87 summarizes the wage ranges for each category.”
38	Clarification	p. 22; paragraph 1	<p>“Although the region’s economy recovered quickly from the COVID recession, ...</p> <ul style="list-style-type: none"> Please clarify how recovery is defined--# of jobs? # of businesses? Unemployment rate? Many businesses closed permanently.

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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		sentence 3	In 2021, the share of workers working from home shot up to over 19 percent. This trend has stabilized nationally, with approximately 20 percent of U.S. workers able to work from home <u>for all or a portion of their work week</u> (see Kane, Moreno, and Myers 2022)."
39	Clarification	p. 23; paragraph 3; sentence 3	"This model computes population at a future point in time by adding to the existing <u>residential population to</u> the number of group quarters population, births, and in-migrants during a projection period and subtracting the number of deaths and out-migrants."
40	Correction	p. 26; paragraph 2; sentence 2	"Regional totals by 2-digit NAICS sector are provided at the SCAG region level for 2019 and 2050 (Table 67)."
41	Clarification	p. 27; paragraph 1; sentence 3	"As such, the projection does not reflect a build-out scenario <u>of all general plans throughout the region though some areas may reach first-stage build out or build out of a general plan's capacity.</u> "
42	Clarification	p. 27; paragraph 1; sentence 4	"Combining the general plan, existing land use, and 2020 Census data above indicate that in the aggregate, local plans in the SCAG region currently have a remaining physical capacity of roughly 8.2 million housing units—several times higher than anticipated household growth—but <u>for these additional units to be realized, the existing structures would have to be demolished and replaced with higher density developments.</u> " <ul style="list-style-type: none"> The 'remaining physical capacity' is only capable of coming to fruition if the existing structures are demolished and replaced.
43	Clarification	p. 27; paragraph 3; sentence 4	"The regional growth vision combines an allocation process <u>rooted in</u> based on Connect SoCal 2020 policies and sustainable growth strategies with a Local Data Exchange <u>process to integrate local information and insights and improve accuracy.</u> "
44	Clarification	p. 27; paragraph 4	"For the purposes of the <u>preliminary growth forecast and forecasted regional development pattern</u> growth vision , PDAs are areas within the SCAG Region where future growth can be located in order to help the region reach mobility or environmental goals."
45	Clarification	p. 27; paragraph 4	"As such, the regional growth vision aims to increase resilience within the region's built systems by taking advantage of existing infrastructure, social system by promoting complete communities, economic systems by promoting proximity to jobs, and natural systems by mitigating growth in hazardous or sensitive areas." Should 'social system' be plural and what social system/s is being referred to?
46	Clarification	p. 28; paragraph 4	"This step improved forecast accuracy by linking it to <u>entitlements and</u> likely development sites while also providing an avenue to consider regional strategies and targets in local plans."
47	Clarification	p. 28; paragraph 4; sentence 2	"Unlike prior regional plans in which the locally-reviewed employment projection increased while the household projection decreased, local jurisdictions' traditional optimism about employment growth was not only matched but was substantially exceeded by optimism about future housing production." <ul style="list-style-type: none"> Reword sentence. There are more entitled housing projects and units that are now included in the 2024 RTP; the higher household projection is not just due to optimism.

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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48	Correction	p. 29; paragraph 1	Change all instances of “PL-94 171” to “P.L. 94-171 Redistricting Data”
49	Clarification	p. 31; paragraph 1; sentence 4	<p>“PUMS data is built by the Census Bureau from hundreds of individual householders’ and associated household members’ responses to ACS survey questions.”</p> <ul style="list-style-type: none"> Only hundreds of people responded to the PUMS/ACS survey? Clarify if these are hundreds of questions answered by individual householders or hundreds of householders answering questions.
50	Clarification	p. 33 Table 12	Add “(July)” to title to clarify these are July totals.
51	Clarification	p. 34; paragraph 3	“The population’s age structure and racial/ethnic makeup are expected to continue <u>their current, gradual pattern of change seen to change in ways that they have been gradually changing</u> in prior decades (Table 5).
52	Clarification	p. 35; paragraph 1; sentence 3	“While the non-White <u>racial/ethnic populations other than non-Hispanic White</u> are is younger, the slower projected rate of total population growth means that most racial/ethnic groups would not see as dramatic share changes as they did in the last thirty years. The largest increases are expected in the <u>non-Hispanic</u> Asian and <u>non-Hispanic</u> two-or-more races populations.”
53	Clarification	p. 35; paragraph 6; sentence 2+	“The top three growth sectors during this time period, in terms of jobs added, are Health Care and Social Assistance sector adding 415,000 thousand jobs, Construction sector adding 139,000 thousand jobs, and Accommodation and Food Service adding 106,000 thousand jobs. Job growth in these three sectors make up half of the projected overall job growth for the region. Sectors where a decrease in jobs is projected between 2022 and 2050 are Finance and Insurance sector of 32,000 thousand jobs and a decrease of 16,000 thousand jobs in the Administrative and Support and Waste Services sectors.”
54	Clarification	p. 45; paragraph 6; sentence 2	“The Local Data Exchange (LDX) process allowed SCAG to harmonize high-level trends with bottom-up community visions <u>and entitled projects.</u> ”
55	Clarification	p. 45; paragraph 3	<p>5.5 TAZ-Level Growth Forecast, Growth Vision, and SCS Consistency</p> <p>Replace section language and corresponding footnote—removing footnote—with the following language:</p> <p>“In order to assess the ability of the Connect SoCal 2024 Plan to meet federal air quality standards and achieve a state greenhouse gas reduction target, SCAG creates small-area projections data for housing, population, and employment, which are known as the Tier 2 traffic analysis zone (TAZ) socioeconomic dataset (SED). Although these data are based in part on input provided by staff from local jurisdictions during the Connect SoCal 2024 Local Data Exchange process, local jurisdictions and projects within the region shall not be held to meet any specific numbers within or aggregates of the TAZ data. Connect SoCal 2024’s TAZ-level household and employment projections are created to provide estimated snapshots in time. These projections do not reflect subsequently available information (given that local jurisdictions provided their local input to SCAG between May and December 2022); and, concerning some jurisdictions, they also do not reflect all currently entitled and pending projects. Additionally, the TAZ data do not project the full build-out and realization of localities’ general plans; and they</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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			<p>do not conform to jurisdictions’ current respective housing elements. The local plans and approvals have continued and will continue to evolve; and market forces will continue to play a major role in determining the timing, locations, and different types of development and redevelopment that will occur. Therefore, the applicable jurisdiction(s) should be contacted for the most up-to-date data available.</p> <p>The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.</p> <p>SCAG’s forecasted regional development pattern (FRDP) is not solely based on the TAZ-level household and employment spatial projections. It is utilized to estimate the overall effect of the many policies, goals, and strategies of Connect SoCal—which should not be uncritically applied, individually or en masse, to any particular project or plan. The TAZ-level household and employment growth projections support the region’s ability to model conformity with federal air quality standards and its ability to achieve a state greenhouse gas reduction target; they do not, however, reflect the only set of growth assumptions that may meet these standards and that target.</p> <p>Therefore, insofar as housing and other laws or grants may require comparisons of projects or plans to Connect SoCal 2024, SCAG’s projections that are illustrated in TAZ maps—along with any related documents or modeling outputs—may not be used to determine the inconsistency of any plan or project in the region with Connect SoCal 2024. Given that land use decisions are properly made with attention to local contexts and circumstances, local jurisdictions and other lead agencies shall have the sole discretion to determine a local project’s or plan’s general consistency and overall alignment with Connect SoCal.</p> <p>For example, local jurisdictions’ plans and approvals may be found to align with Connect SoCal 2024 if they directionally support a number of its objectives, such as by encouraging a mix of housing types that includes more affordable and multi-family housing rather than solely single-family, for-sale housing; providing for more housing located proximate to employment or vice versa; or encouraging increased use of transit, ridesharing, biking, walking or micro-mobility, or hybrid and remote work to reduce commuting trips. Such alignment is an appropriate basis for a local jurisdiction to determine that a plan or project is consistent with Connect SoCal 2024. Such determinations should be evaluated based on (i) the totality of the goals, policies, and objectives of Connect SoCal 2024 and its associated Program Environmental Impact Report (PEIR), and (ii) the attributes of the local</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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			<p>project or plan in overall relation to Connect SoCal, and not in a prescriptive manner by applying SCAG’s TAZ-level data, any aggregate thereof, or any particular one or more goals, policies, or objectives of Connect SoCal 2024 and its associated PEIR.</p> <p>This flows logically from the fact that Connect SoCal 2024 includes dozens of stated directives, policies, goals, objectives, and measurements, any number of which may not be individually applicable to any given project or plan. For example, a project that provides new housing units in conformity with a jurisdiction’s approved housing element can and should be found to be in overall alignment with Connect SoCal 2024 given housing production’s contribution to Connect SoCal 2024 goals and policies, especially those related to affirmatively furthering fair housing, social and economic justice, jobs-housing balance, and the like.</p> <p>Household or employment growth included in the Connect SoCal 2024 TAZ-level SED and maps may assist in determining consistency with the SCS for purposes of determining a project’s eligibility for CEQA streamlining under SB 375 (Cal. Govt. Code § 21155(a)). TAZ-level maps and data may not otherwise be used or applied prescriptively to determine that a project is inconsistent or not in alignment with Connect SoCal 2024 for any purpose, given that myriad other development assumptions could also be found to be consistent or, on balance, aligned with the SCS. Specifically, the TAZ-level data and maps do not supersede or otherwise affect locally approved housing elements, including those adopted in compliance with the 6th Cycle of the Regional Housing Needs Assessment (RHNA).”</p>
56	Clarification	p. 46; paragraph 1	“More small households will form as overcrowding pressures ease, particularly during the first half of the Plan period horizon.”
57	Clarification	p. 46; paragraph 3	“While the region showed resilience in the recent recovery from the COVID COVID-19 pandemic-related economic downturn, the pandemic hastened the acceptance of remote work and adoption of technologies that minimize human interaction or that automate work.”
58	Clarification	p. 48; Map 2 p. 49; Map 3 p. 51; Map 5 p. 52; Map 6 p. 53; Map 7	Add language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

Table 6. ECONOMIC IMPACT ANALYSIS TECHNICAL REPORT COMMENTS

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8	General Comment	All pages	Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence” the growth must be feasible
9	General Comments	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
10	Clarification	All pages	<p>Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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12	General Comment	All pages	Add “2024 Technical Report” to the header of each page
13	Clarification	p. 2; paragraph 2	“In 2023, the economic impacts of Connect SoCal 2024 on the <u>SCAG-region</u> SCAG region economy are at least as important, if not more. The SCAG region is in a similar situation recovering from the economic shock of the <u>response to the</u> COVID-19 pandemic, which upended nearly every aspect of the regional (and global) economy. COVID-19 had unprecedented impacts on the labor market. For example, pandemic-induced workplace closures drastically changed commuting patterns and employment locations. The pandemic <u>response</u> accelerated the decades-long increasing trend of remote and hybrid work, and because of pandemic-induced technological and cultural change, is likely to persist into the foreseeable future (Barrero, Bloom, and David 2023).”
14	Clarification	p. 2; paragraph 3; sentence 2	“The SCAG region has proven resilient in its recovery from the short but sharp COVID-19 recession. Connect SoCal 2024 investments, policies, and strategies strive to be more than the sum of their parts and capture synergies for the Plan. The intent is to fulfill the Plan’s vision of a healthy, prosperous, accessible, and connected region for a more resilient and equitable future ⁱ . Connect SoCal 2024 adds important emerging priorities for the region: a plan that fosters regional resilience, equitable and inclusive economic growth for all <u>SCAG-region</u> SCAG region residents.” <ul style="list-style-type: none"> • Use footnotes instead of the single endnote in the document
15	Correction	p. 2; paragraph 5; sentence 2	“Connect SoCal 2024 details <u>SCAG-region</u> SCAG region transportation spending exceeding \$413 billion...”
16	Clarification	p. 3; paragraph 2	“Achieving the Plan’s promise of economic growth requires us to recognize that the region faces significant income inequality. For example, in 2021, in the SCAG region, <ul style="list-style-type: none"> • Hispanic workers earned 56 percent of White worker wages, • Black workers earned 72 percent of White worker wages, and • Women earned 81 percent of men’s wages. (American Community Survey, 2021)” <ul style="list-style-type: none"> • Is this using median or average wages? • Are the comparisons controlled for years or experience, education or any other factors?
17	Clarification	p. 3; second set of bullet points	“9.7 percent of the region’s households lived in overcrowded housing compared to 7.0 percent for the rest of California and 3.4 percent for the U.S., and <ul style="list-style-type: none"> • Housing costs overburdened 45 percent of the region’s households” <ul style="list-style-type: none"> • Please define ‘overcrowded’ and include source • Please define ‘overburdened’ and include source
18	Clarification	p. 5; paragraph 4; sentences 1-2	“A mix of transportation projects <u>is</u> planned in the six SCAG counties over the 26-year model timeframe. Of the total Connect SoCal 2024 expenditures exceeding \$413 billion (constant 2023 dollars).”

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none"> Second sentence is incomplete
19	Clarification	p. 11; paragraph 2; sentence 2	<p>“Under the Plan and incorporating the network efficiency gains would increase GDP by \$48 billion (2023 constant dollars) annually, on average.”</p> <ul style="list-style-type: none"> Sentence structure is awkward. Reword for clarity.
20	Clarification	p. 14; paragraph 1; last sentence	<p>“However, the federal government and California agencies such as CARB and CalTrans rely on the SC-GHG based on the work of the Interagency Working Group on Group on the Social Cost of Greenhouse Gases Gasses (“IWG”). Therefore, for our analysis, we utilized adopt the IWG’s IWG SC-GHG.”</p>
21	Clarification	p. 14; paragraph 1; sentence 1 last sentence	<p>“The IWG is a group of scientists convened in 2009 by the federal Council of Economic Advisers and the Office of Management and Budget...</p> <p>However, some damages are difficult to quantify and <u>are</u> omitted from the SC-GHG models, including impacts from increased wildfire...”</p>
22	Clarification	p. 16; paragraph 1; sentence 1	<p>“In addition to <u>the</u> co-benefit of reduced GHG emissions, vibrant, multi-modal places foster increased physical...”</p>
23	Clarification	p. 17; Table 6	<p>Table source: cite original data sources instead of other tables in the report so the table can be extracted and serve as standalone information.</p>
24	Clarification	p. 17; paragraph 1; sentence 2	<p>“However, the SCAG Regional Council adopted the Inclusive Economic Recovery Strategy in July 2021 and, with a grant from the State of California, started implementing strategies for equitable and inclusive economic growth (see Chapter 3 of the <u>2024 Connect SoCal report</u> Main Book)—specifically focusing on racial disparities.”</p>
25	Clarification	p. 17; paragraph 1; sentence 2	<p>“Figure 3 shows that, on average <u>and not controlling for factors such as field of work, years of experience, or education</u>, women earned 81 percent of what men earned in the SCAG region in 2021. <u>Non-Hispanic</u> Black workers earned 72 percent, and Hispanic workers earned 56 percent of <u>non-Hispanic White, non-Hispanic</u> workers’ earnings in the SCAG region in 2021.”</p>
26	Clarification	p. 18; Figure 3	<p>Change Title: “ Percent of <u>Non-Hispanic</u> White Worker Wages”</p> <p>Update categories to <u>Non-Hispanic</u> White <u>Non-Hispanic</u> Black/AA Hispanic <u>Non-Hispanic</u> Nat Am <u>Non-Hispanic</u> Asian/PI Other <u>Non-Hispanic</u></p> <p>“Notes: Based on 2021 American Community Survey 1-Year PUMS Sample. Includes wage and salary workers in the labor force, age 25-64. Excludes observations with labor income below 1st and above 99th percentiles. All races are non-Hispanic. Hispanic includes any race identifying as Hispanic <u>or Latino.</u>”</p>
27	Clarification	p. 19; paragraph 2; sentence 2	<p>“<u>For illustrative purposes, assuming</u> that this gain in GDP is equally distributed across industries, we can infer that the economic growth from Connect SoCal 2024 transportation investments we computed in Section 3.”</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
28	Clarification	p. 18; Figure 3	“Notes: Based on data from the 2021 American Community Survey PUMS 1-Year Sample. Includes wage and salary workers in the labor force aged 25-64. Excludes observations with labor income below 1st and above 99th percentiles. All races are non-Hispanic. Hispanic includes any race identifying as Hispanic_or Latino. SCAG region GDP estimated at \$1.4 trillion in 2021 (REMI).”

Table 7. EQUITY ANALYSIS TECHNICAL REPORT COMMENTS

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add “2024” to all technical report page headers’ titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
7	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”
8	Table 1: Summary of Performance Measures	p. 4 – 8; Table 1	In the Table 1: Summary of Analysis column, it would be helpful to the reader if the condition(s) reported for all the performance measures, are identified as a condition applicable to either an Existing or Plan timeframe. The approach used in Rail-Related Impacts (page 6) is an excellent approach in distinguishing between Base Year and the Plan. Others are unclear, such as Share of Transportation Usage (page 4), and Bicycle and Pedestrian Collisions (page 5).
9	Table 1: Summary of Performance Measures: Impacts From Mileage-Based User Fees	p. 8; Table 1	The Summary of Analysis for the "Impacts from Mileage-Based User Fees" states that ".... it is crucial to ensure user fee programs are designed equitable, to insure that vulnerable communities experience the benefits of road pricing without regressive financial impacts." Is there an associated policy recommendation to support this conclusion that should be referenced? In reviewing the Plan Strategies (Section 3.4: Plan Fulfillment), do any of the Regional Planning Policies incorporate this implementation finding? If not, should there be such a policy? The one policy that links closest to the issue is the Funding the System/User Pricing Strategy which states "Study and pilot transportation user-fee programs and mitigation measures that increase equitable mobility." Does "equitable

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			mobility" clearly address tackling regressive financial impacts of any road pricing program to vulnerable communities?
10	4. Analytical Approach: 4.1 Outreach Efforts Not in Priority Equity Communities	p. 17	There is a subsection bullet listing of what appears to be outreach workshop participant input of what should not be designated as Priority Equity Communities. It would help the reader if the bullet listing could be prefaced with an introductory sentence to provide context, such as "Workshop participants further identified several populations that should not be considered when analyzing equity. These include:" [if this is the correct context]
11	Table 3: Priority Population Descriptions Limited Vehicle and Transit Population	p. 21	Table 3 includes a "Limited Vehicle and Transit Population" priority population and defines this population as "Households with more members than vehicles owned that are not within a census tract that intersects with a High-Quality Transit Corridor." Please clarify if the definition applies to "members <i>of driving age</i> ."
12	Figure 1: Population in Priority Equity Communities by County	p. 22	It would be helpful if Figure 1 also includes a SCAG Region bar of the regional percentage of Priority Equity Population of 48.6%, to provide the reader with immediate visual context of how each county percentage compares to the regional percentage and avoid having the reader to refer to the preceding paragraph for the context.
13	4.4 Impact Assessment	p. 28	This section of the Technical Report states that "As described in the Main Book, SCAG conducts a 'Plan' vs 'No Plan' (or Baseline) analysis which compares how the region would perform with and without implementation of <i>Connect SoCal</i> . Please clarify if the reference to <i>Connect SoCal</i> is Connect SoCal 2020 or Connect SoCal 2024, since the use of the phrase has been used in SCAG documents to refer to both the 2020 and the 2024 plan.
14	5.1 Comparison of Existing Conditions in the Region and in PECs: Asian population	p. 30-31 Table 7	The technical report states that "In contrast, over 60 percent of the region's Hispanic/Latino population Asian population and Native Hawaiian/Pacific Islanders were in Priority Equity Communities." This data does not match with the data in Table 7. Specifically, Table 7 illustrates that the Asian population is at 44.2%. If the Table 7 data is correct, the narrative should delete the reference to Asian populations.
15	5.1 Comparison of Existing Conditions in the Region and in PECs: Average HH Size	p. 30	The technical report states that the average household size in Priority Equity Communities is larger than the region. Is there some comparison data that can be provided? This would be helpful, as there is then a subsequent sentence that states <u>only</u> 46.3% of the region's household were in Priority Equity Communities, as compared to 48.6 percent of the total regional population share. Since households are all the members living in a housing unit, is this comparison of value?
16	6. Analysis: Mobility Vehicle Ownership	p. 37 & 38 Table 6	The technical report, page 37, last paragraph, states that "Figure 6 shows the percentage of householders that do not own an automobile. Almost seven percent of all householders within the SCAG region, and nine percent of householders of color, do not have access to or own a vehicle." Technically, Figure 6 does not illustrate that nine percent of householders of color do not have access to or own a vehicle. Was this an average percentage that was calculated from the raw numbers?

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
17	6.1 Share of Transportation Usage System	p. 40 & 41 Table 10	<p>Page 40 of the technical report, last paragraph, states that "Black travelers had the second highest share of bus trips at 18.9%, a rate three times the regional usage, the highest usage rate compared to other racial/ethnic groups."</p> <p>There are some internal inconsistencies within the sentence and with the information on Table 10.</p> <p>a) The sentence makes reference to Black travelers having both the second highest share of bus trips as well as the highest usage rate. Based on the information in Table 10, it appears that the Hispanic/Latino population has the highest bus transit usage.</p> <p>b) If the regional share of bus usage is 2.3%, according to Table 10, how did the report calculate that Black travelers use bus transit at a rate of three times the regional usage? Seems to be much higher than three times.</p>
18	6.2 Travel Time and Travel Distance Savings 6.2.2 Results	p. 41 & 42 Figure 7 p. 43	<p>The Technical Report, page 41, last paragraph, states that "As shown in Figure 7, people of color experience longer travel times and distances using public transportation than auto..." and then continues with certain populations have longer travel time distances than other populations. Page 43: Results, third paragraph, continues to identify comparisons by race and ethnicity for public transportation.</p> <p>a) In reviewing the data on the referenced Figure 7, is the "Bus, Rail, Taxi or Ferry" category for commute times the same as "public transportation"? If that is correct, please also label as "Public Transportation: Bus, Rail, Taxi or Ferry."</p> <p>b) In reviewing the data on the referenced Figure 7, is the "Car or Motorcycle" category for commute times the same as "auto"? If that is correct, please also label as "Auto" so the narrative matches the Figure.</p> <p>c) If Public Transportation represents those four categories: Bus/Rail/Taxi/Ferry, the narrative/conclusions on pages 41 and 43 do not seem to match up with the data in Figure 7. Please re-review and appropriately correct.</p>
19	6.3 Access to Everyday Destinations: Travel Cost Threshold	p. 52	<p>The Equity Technical Report identifies that it uses a "Travel Cost Threshold" as a metric to measure access to destinations. The narrative on page 52 would benefit from a definition and explanation of a travel cost threshold, to set the context for the information in Table 11: Survey of Metrics for Access to Everyday Destinations.</p>
20	7. Analysis: Communities	p. 77 & 78 Figure 24	<p>The narrative on page 77, last paragraph, states that Figure 24 (on page 78) identifies households without broadband access. Further, that Black households (4.3%) are most likely to not own a computer. When looking at the percentages in the referenced Figure 24, the figure is labeled as "people living in households". Please clarify if the percentages shown in Figure 24 are the number of households (which can be occupied by more than one person), or the percentage of the total population living in those households (i.e., number of households multiplied by an average population per unit factor).</p>
21	7.3.2 Rail-Related Impacts Results	p. 96	<p>The conclusion on rail-related impacts seems to be vague on explicitly explaining the impacts of populations living proximate to railroads and</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<p>railyards between Baseline and the Plan (e.g., "SCAG anticipates nominal plan impact or small differences between the Baseline and Plan scenarios, and that population changes would generally follow that of the SCAG region.")</p> <p>From an equity perspective, does this section address if the existing Baseline condition is a problem and needs to be addressed, especially if the conclusion is that there will be no significant change with implementation of the Plan?</p>
22	9.2.2 Investments vs Benefits: Results	p. 135 Figure 43	The technical report identifies that Figure 43 illustrates that the Connect SoCal 2024 investments in projects most used by Hispanic/Latino and Asian populations are lower compared to people of other races and ethnicities. Is this an equity issue that warrants greater discussion? Leaves the reader hanging.
23	9.4 Impacts from Mileage-Based User Fee 10. Equity Resources for Action Toolbox: 10.4.5 Road Pricing Programs	p. 142 p. 171	<p>The last paragraph on page 142 states that a Community Advisory Committee "expressed skepticism about road pricing as a pathway to more equitable transportation." This needs to be expanded and summarized as to the concerns expressed by the Community Advisory Committee. If there is skepticism to the equity of road pricing, the technical report should flush out what the concerns were, and whether the three recommended bullet points for pricing-related advocacy, effectively eliminates the fundamental issue or if it still remains.</p> <p>This issue then carries over into the Equity Toolbox: 10.4.5 Road Pricing Programs, which recommends that local agencies and groups "Adjust mitigation of negative impacts on vulnerable communities to reflect the specific impacts of pricing programs and local conditions." This is very vague and unclear and warrants expansion and context narrative.</p>

Table 8. GOODS MOVEMENT TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add "Technical Report" and "2024" to all technical report page headers' titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
#	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.

Table 9. HOUSING TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add “2024” to the header of each page
2	General Comment	All pages	Within all tables, columns with numbers and their header rows should be right justified.
3	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
4	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	General Comment	All pages	Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence” the growth must be feasible
8	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
9	Clarification	All pages	<p>Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.
10	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”
11	General Comment	All pages	Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of “non-Hispanic” even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White...
12	Clarification	p. 1; paragraph 3; last sentence	“This report focuses on housing need and strategies that can support housing production and is complemented by the Land Use and Communities Technical Report which guides where and how development, including housing, may should occur in the region in <u>a way that is in</u> alignment with Connect SoCal 2024.”
13	Clarification	p. 1; paragraph 4 p. 2 1. Executive Summary Existing Housing Need 2. Why Housing Matters	Page 1, fourth paragraph, discusses the current housing crisis and includes the statement that "A shortfall of housing to meet the needs of the SCAG region have created issues such as cost-burden and overcrowded households." As has been discussed during the 6th cycle RHNA process, one factor for the significant increase in the SCAG region's 6th cycle housing need number – as determined by State HCD – is a shortfall of housing to meet the housing needs of the <u>existing</u> population. This existing housing need number was then added to State HCD's calculation of the region's future housing need for future population for the State's 6th RHNA cycle. A discussion and clarification of existing housing need is recommended to be added to the Executive Summary and to Section 2: Why Housing Matters, to enable the reader to understand why there is a backlog of housing need.
14	Clarification	p. 1; paragraph 5 1. Executive Summary Barriers to Housing Production	Page 1, paragraph 5, discusses barriers to housing production, which include "lack of resources, community opposition, increasing construction costs, and the fiscalization of land use...". a) For the layperson, an explanation of "fiscalization of land use" would be recommended. b) Also, other factors that challenge housing production include: insufficient funding that can be provided to developers, to help subsidize the cost of building affordable housing units, especially with the elimination of state redevelopment funds; and, conflicting state requirements over housing production versus coastal lands protection on lands governed by the California Coastal Commission. While the sixth paragraph states that "Funding is available from the State to implement plans and projects at the regional and local levels," this sentence downplays the extent of funding needed to assist in housing production.
15	Clarification	p. 1; paragraph 6; last sentence	“Long term SCAG implementation strategies include providing technical assistance to housing element implementation, aligning housing-supportive infrastructure, and continuing its outreach and education efforts.”

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none"> What is 'aligning housing-supportive infrastructure'?
16	Clarification	p. 2; paragraph 3; sentence 2	"However, while its core function was to insure home mortgage loans made by banks and private lenders, the FHA refused to insure mortgages in Black neighborhoods, often forcing them to move into urban housing projects and <u>rendering them</u> unable to build generational wealth that accompanies homeownership."
17	Clarification	p. 2; paragraph 5; sentence 2	"Even in neighborhoods where people of color found housing, <u>some</u> urban renewal policies destroyed <u>some</u> existing communities and displaced their residents."
18	Clarification	p. 2; paragraph 6; sentence 1	"Today, the quantitative impacts of the housing crisis such as overcrowding, cost-burden, and <u>low</u> home ownership, disproportionately burden communities of color."
19	Clarification	p. 3; paragraph 2 2. Why Housing Matters	The last paragraph of the "Why Housing Matters" section states that the Technical Report does not specifically define a quantitative threshold for what constitutes affordable housing. Nonetheless, there should be an additional sentence that identifies that the SCAG region jurisdictions, as a whole, must plan for more than 40% of its RHNA housing to be affordable to Extremely Very Low, Very-Low and Low Income households, per the 6th cycle RHNA allocation. This is an important context for the reader to understand, especially when addressing the challenges of housing production.
20	Clarification	p. 3; paragraph 5; 3.1 Local General Plans and Housing Elements	This section, third paragraph, states that "Jurisdictions are required to update their housing elements to demonstrate how they would accommodate future housing need by preparing a sites inventory." As noted in the earlier comment, housing need comprises both existing and future housing needs. Please clarify in the above-referenced statement.
21	Clarification	p. 3; paragraph 5; sentence 3	<p>"In addition to the sites inventory, the housing element must identify existing and special housing needs, such as units at-risk for conversion, overcrowding and cost-burden households, population and household characteristics, seniors, and people experiencing homelessness."</p> <ul style="list-style-type: none"> Use semicolons to clarify meaning: "In addition to the sites inventory, the housing element must identify existing and special housing needs, such as units at-risk for conversion; overcrowding and cost-burden households; population and household characteristics; seniors; and people experiencing homelessness."
22	Clarification	p. 4; paragraph 1 3.2 RHNA Local COG	This section, first paragraph, states that "The [RHNA] allocation for each jurisdiction is developed by a local Council of Governments (COG) such as SCAG." Is a "local" COG an accurate description of SCAG, or is "regional" a more appropriate descriptor?
23	Clarification	p. 4; paragraph 1; sentence 4	"The RHNA process is repeated every eight years to ensure that the State's housing needs are being <u>addressed</u> met and coincides with the housing element update period."
24	Clarification	p. 5; paragraph 1; sentence	"Meanwhile, these factors strengthen SCAG's Connect SoCal regional strategies of growth near destinations and mobility options. <u>These strategies include</u> such as emphasizing land use patterns that facilitate multimodal access to work, educational and other destinations and prioritizing infill and redevelopment of underutilized land to accommodate

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			new growth and increasing amenities and connectivity in existing neighborhoods.”
25	Clarification	p. 5; paragraph 2	“The 6 th cycle final RHNA plan was adopted by SCAG in March 2021.”
26	Clarification	p. 5; paragraph 3	<p>“Together with the General Plan and housing element, the RHNA allocation is a vision of a local jurisdiction’s household need and the ways to accommodate its existing and future need while achieving its goals.”</p> <ul style="list-style-type: none"> Clarify who and what goals is being referred to at the end of the sentence.
27	Clarification	p. 5, 6 4 Existing Conditions	This section, first paragraph, states that "An analysis of existing conditions for the region's housing characteristics provides insight on housing trends, helps identify housing issues communities are facing, and predicts the future needs of the region." How does an existing conditions analysis predict future needs? Please provide a clarifying example or eliminate the reference. The last sentence of Section 4 (on page 6) is perhaps a more appropriate descriptor: "Evaluating the region's housing existing conditions helps SCAG understand the challenges the region is facing to develop implementation strategies and policies to alleviate these challenges moving forward."
28	Clarification	p. 6; paragraph 2	<p>“According to [insert agency data is sourced from], as of 20xx, the SCAG region has hosts a total of 6,622,509 units in its housing stock. Over half of these units were built before 1980, approximately over 40 years ago. The SCAG region follows California’s trend of increasing housing production until 1980 when housing production began begins to decrease dramatically each year thereafter, which has led to a housing shortage (Figure 1). Moreover, Senate Bill 375 (SB 375) became law in 2008, but since then, only 5 percent of total housing stock has been built. While this indicates that growth in housing supply has been slower than anticipated, it also indicates a significant barrier to realizing the vision of SB 375 as the only way to get more housing near transit is to also have more housing overall.”</p> <ul style="list-style-type: none"> In last sentence, why is housing supply ‘slower than anticipated’? Sentence is unclear, please reword.
29	Clarification	p. 6; paragraph 2; last sentence 4.1 Housing Stock SB 375 reference	<p>"...realizing the vision of SB 375 ... to get more housing near transit, is to have more housing overall."</p> <p>The directive of SB 375 is to reduce greenhouse gas emissions through a complement of land use planning and transportation investments. Please provide a statute citation that documents that SB 375 calls for having more housing overall in order to have more housing near transit.</p>
30	Clarification	p. 6; paragraph 3	<p>“Geographically in the SCAG region, as housing production continued to decrease dwindle in Los Angeles County, housing production stayed strong in the Inland Empire, which encompasses Riverside and San Bernardino Counties. Determining where housing is needed is a major geographical challenge. Housing production is needed across the region, and in addition to infill areas and other urban locations, housing is still needed in less dense and connected areas. The underproduction of housing has had negative impacts implications on people throughout the region, leading to overcrowding and additional cost burden that disproportionately affect communities of color.</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			Figure 1. SCAG Counties <u>Counties</u> 2021 Housing Stock”
31	Clarification	p. 7; paragraph 1; sentence 2 4.1 Housing Stock Housing Built before 1990	Page 7, first paragraph, makes an argument that living in a home built before 1990, "when combined with other conditions such as substandard facilities, cost burden, overcrowding and housing <u>under</u> production ... results in a scenario where the region is not meeting the housing needs of who is already here in the region." <ul style="list-style-type: none"> • Please provide a citation of source of this conclusion that housing structure age is a key determinant of why the region is not meeting its existing housing need. • And further, how the age of a housing structure "results in a scenario of disproportionate burden and inequity." • In looking at the Section 4.3: Complete Facilities narrative on pages 10-11, there is no discussion or presentation of data about the age of the housing structure as it relates to the units inventoried as lacking kitchen or plumbing facilities.
32	Clarification	p. 7; paragraph 2; sentence 3	“In every county <u>in the SCAG region</u> , there are more homeowners than renters, except for Los Angeles County which has a 55 percent renter-occupied housing rate. However, a look at housing tenure among communities of color reveals an inequitable distribution of homeownership.”
33	Clarification	p. 7; paragraph 3; sentence 3	Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of “non-Hispanic” if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly. For example: “According to SCAG’s 2022 Racial Equity Baseline Conditions Report, 61 percent of <u>non-Hispanic</u> White households owned their home compared to only 58 percent of <u>non-Hispanic</u> Asian/Pacific Islander households, 44 percent of Hispanic (<u>or</u> Latino) households, 36 percent of <u>non-Hispanic</u> Black households, and 47 percent of <u>non-Hispanic</u> Native American households. This means that <u>non-Hispanic</u> White household homeownership is nearly twice the rate of <u>non-Hispanic</u> Black households.”
34	Clarification	p. 9 Figure 5 4.2 Housing Tenure By Race & Ethnicity	When discussing home ownership by race and ethnicity, the narrative on page 7 cites SCAG's 2022 Racial Equity Baseline Conditions Report, while Figure 5 cites U.S. Census Bureau data. The use of two cited sources results in homeownership percentage figures that are close but not consistent. <ul style="list-style-type: none"> • Please specify whether the racial/ethnic categories are all for non-Hispanic groups other than <u>Hispanic (or Latino)</u>; if so, add “non-Hispanic” to categories other than Hispanic/Latino.
35	Clarification	p. 10	This section, first paragraph, states that "there are still 80,909 units lacking complete kitchen facilities and 22,282 units lacking complete plumbing facilities in the SCAG region."

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
		4.3 Complete Facilities	<ul style="list-style-type: none"> • Please also include the total number of housing units in the SCAG region, to provide context on the extent of substandard units. • Cite source and year of data. • Note that JADUs do not require a separate bathroom but are considered a housing unit. • The U.S. Census Bureau counted thousands of additional housing units in the SCAG region that were not estimated by State DOF or reported by cities and counties as officially permitted units. Many of these are presumed to be non-traditional living quarters and may not have full kitchen or plumbing. The Bureau states that “Even tents, old railroad cars, and boats are considered to be living quarters if someone claims them as his or her residence.” (page B-8 https://www2.census.gov/programs-surveys/decennial/2020/technical-documentation/complete-tech-docs/summary-file/2020Census_PL94_171Redistricting_StatesTechDoc_English.pdf) <p>f) If people were living in these structures/objects at the time of the 2020 Census, these were counted as ‘housing units’ and reported in the 2020 Census housing count that is used as a benchmark by DOF and most agencies.</p>
36	Clarification	p. 10; paragraph 2	<p>Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of “non-Hispanic” if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly.</p> <p>For example: “This issue becomes more pronounced when analyzing rates among communities of color and comparing them to <u>non-Hispanic White</u> communities and regional averages. SCAG’s 2022 Racial Equity Baseline Conditions Report found that in the SCAG region, <u>non-Hispanic Native Americans</u> and <u>non-Hispanic Black</u> residents are three times more likely to live in housing units without plumbing facilities than <u>non-Hispanic White</u> households (1.1 percent, 0.7 percent, and 0.3 percent, respectively). Across the region, 1.4 percent of <u>non-Hispanic White</u> residents live in housing units without complete kitchen facilities, compared to 2.0 percent for <u>non-Hispanic Native Americans</u> and 1.8 percent for <u>non-Hispanic Asians/Pacific Islanders</u>. This inequity is particularly apparent in rural Imperial County, where one out of every 20 <u>non-Hispanic Black</u> residents (about 5 percent) live in housing units without complete kitchen facilities, which is significantly higher than the overall county rate of 0.9 percent. A similar trend is found in Ventura County where 3.1 percent of <u>non-Hispanic Black</u> people live without kitchen facilities compared to <u>non-Hispanic White</u> people at 1.2 percent.⁶ The disproportionate rates of substandard housing in communities of color compared to <u>non-Hispanic White</u> communities and the overall average suggest that the production of more housing in these</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			communities, especially in rural and non-infill areas, can address historical disparities.”
37	Clarification	p. 11, Figure 8 4.3 Complete Facilities	a) Figure 8 does not have any bar illustrating the percentage of White households that lack kitchen and plumbing facilities. Is the first "Other" bar incorrectly labeled, and should be the "White" bar at 0.19%? b) Also, there is no discussion about the information in Figure 8, in the narrative. The narrative cites SCAG's 2022 Racial Equity Baseline Conditions Report, where the lack of kitchen facilities is independently quantified from the lack of plumbing facilities. Figure 8, on the other hand, tabulates the percentage of households (by race and ethnicity) lacking kitchen and plumbing facilities <u>combined</u> and not separately. As a result, the percentage numbers between the narrative and Figure 8 do not match. c) Please specify whether the racial/ethnic categories are all for non-Hispanic groups other than Hispanic (or Latino); if so, add “non-Hispanic” to categories other than Hispanic/Latino.
38	Clarification	p. 12; paragraph 1; sentence 3	“Households that spend more than 30 percent of their income on housing are considered <u>cost burdened</u> “overpaying” and will have less income to spend on both essential needs, such as food and transportation, and discretionary purchases.” <ul style="list-style-type: none">“overpaying” is not the same as “cost-burdened”- overpaying is associated with the cost of the rent, not the share of income being paid on rent.
39	Clarification	p. 12, 13 Figure 9 Figure 10 4.4 Cost Burdened Households 2012, 2019, 2021	This section discusses the percentage of cost burdened households, across several referenced years (2012, 2019 and 2021). However, the percentages cited in the narrative, do not match the information in Figure 9 or Figure 10. Please re-review and correct. One issue could be that the narrative separates a discussion of renters versus owners, whereas the Figures could possibly be a combination of all households (i.e., renters <u>and</u> owners). However, the discussion relating to all households (renters and owners) on page 12 and supposedly illustrated in Figure 10, still does not match. And the conclusion: that 43.2% of all occupied housing units in the SCAG region are cost-burdened, does not seem to be illustrated in Figure 10. Depending on the corrections needed, update the last sentence: “However, in Orange County, the ratio of severely cost-burden households of all overall paying renters increased by 2.4 percent.”
40	Clarification	p. 14; Figure 11	Please specify whether the racial/ethnic categories are all for non-Hispanic groups other than Hispanic (or Latino); if so, add “non-Hispanic” to categories other than Hispanic/Latino.
41	Clarification	p. 14; paragraph 1; sentence 2	“All other racial and ethnic households experienced greater cost burden regardless of whether they rent or own their homes than when compared to <u>non-Hispanic</u> White households. Hispanic (<u>or Latino</u>) and <u>non-Hispanic</u> Black homeowners and renters experience the greatest cost burden across racial and ethnic households in the SCAG region.”
42	Clarification	p. 16; paragraph 1; sentence 2	“When considering income, there are emerging inequities for households with very low income.” This sentence is unclear and does not explain emerging inequities.

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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			<p>“Severe cost burden overpayment is a particular burden for low-income families, who have extremely limited resources to spend on daily needs such as transportation, food, and healthcare in addition to housing costs.” Use consistent language throughout document.</p>
43	Clarification	p. 16; paragraph 2 & 3	<p>Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of “non-Hispanic” if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly.</p> <p>For example: “A disparity in cost burden emerges in a further analysis between communities of color and <u>non-Hispanic White</u> communities. Across the region, <u>non-Hispanic Black</u>, Hispanic (<u>or Latino</u>), and <u>non-Hispanic Native American</u> households – regardless of whether they own or rent – experience the greatest housing cost burdens. While a little over one of four <u>non-Hispanic White</u> households pay more than 30 percent of their income on rent, almost one out of two Hispanic (<u>or Latino</u>) households do (46 percent). This figure is 41 percent for <u>non-Hispanic Black</u> households and 33 percent for <u>non-Hispanic Native American</u> households. The high burden of housing costs carries over into homeownership. For Hispanic (<u>or Latino</u>) home-owning households, 18 percent are cost burden and is 14 percent and 17 percent for <u>non-Hispanic Black</u> and <u>non-Hispanic Native American</u> households, respectively. This is significantly higher than the rate for <u>non-Hispanic White</u> home-owning households at 10 percent.</p> <p>Considering that communities of color have almost twice the rate of poverty (households below 200 percent the poverty line) than the <u>non-Hispanic White</u> community (41 percent and 22 percent, respectively), cost burden inequities further widen for these communities since fewer resources are available to spend on necessities such as food, transportation, and healthcare.”</p>
44	Clarification	p. 16 4.4 Cost Burdened Households By Race & Ethnicity	<p>a) The page 16 discussion on cost-burdened households by race and ethnicity and the SCAG region overall, cites percentages that seem to lack a data source. Is this also SCAG’s 2022 Racial Equity Report (the Source Reference #7 at the end of the last sentence in the third paragraph of this section)?</p> <p>b) It would also be helpful to the reader if the cost burdened information by race and ethnicity could also be presented in a Figure, to allow for a more streamlined comparison of the data.</p>
45	Clarification	p. 16 & 18; +Figure 14 4.5 Overcrowding	<p>a) The Overcrowding discussion, starting on page 16, states that the U.S Department of Housing and Urban Development defines overcrowding as more than 1.01 persons per room in a housing unit. Please include a footnote or clarification that there are certain rooms in a housing unit that are excluded from the 1.01 persons per room calculation and identify said rooms that are excluded.</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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			<p>b) Please reference in the narrative discussion, the associated Figures that illustrate the overcrowding data (e.g., Figure 12, Figure 13, Figure 14 and Figure 15, where applicable in the narrative discussion).</p> <p>c) The narrative also states that "Since 2012, these [overcrowding] percentages have slightly decreased." Please clarify if "these" refers to Los Angeles County or the SCAG region. Unclear.</p> <p>d) Figure 14 is: missing/mislabeled the bar to illustrate the percentage of White households experiencing overcrowding. The title of Figure 14 should also reference that it is households that is being depicted.</p> <p>e) Figure title suggests data is broken out by race and ethnicity; please clarify if all groups listed mutually exclusive or if it is 'select racial/ethnic' categories being reported if only Whites are broken out as being Hispanic or not. Figure should be labeled accordingly.</p> <p>f) The narrative on the second paragraph of page 18 states that Black and Asian/Pacific Islander households have overcrowding rates of 3 and 4 percent, respectively. If the report is rounding up the percentages illustrated in Figure 14, the percentage for Asian/Pacific Islanders should be revised from 4 to 5 percent, similar to what was done for the Black households data.</p>
46	Clarification	p. 18; paragraph 2	<p>Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of "non-Hispanic" if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly.</p> <p>"Similar to other data on existing conditions shared in this chapter, communities of color represent a disproportionate amount of the SCAG region's overcrowded population <u>overcrowding data</u>. Across the region, there is a much higher likelihood for Hispanic (<u>or Latino</u>) households to be living in overcrowded housing with approximately one out of 10 <u>households</u> in overcrowded conditions at 10 percent, while <u>non-Hispanic White</u> households have a rate of about one out of 100 (1 percent). While lower than Hispanic (<u>or Latino</u>) households, <u>non-Hispanic Black</u> and <u>non-Hispanic Asian/Pacific Islander</u> households also have higher overcrowding rates at 3 percent and 4 percent, respectively.⁸"</p>
47	Clarification	p. 19; paragraph 1; last sentence	<p>"Housing prices and rents increase further out of reach for existing residents."</p> <ul style="list-style-type: none"> • Sentence seems incomplete.
48	Clarification	p. 19; paragraph 2	<p>"This neighborhood change of a <u>lower-income neighborhood</u> an initially lower socioeconomic status transitioning to one of higher <u>income and socioeconomic status</u>, also known as gentrification, is considered as a precursor to rising housing costs and displacement....The same study noted there was no significant relationship between rent increases and losses of low-income White households.⁹"</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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			<ul style="list-style-type: none"> Does the last sentence refer to Whites that may also be Hispanic or Latino or non-Hispanic Whites?
49	Clarification	p. 20-21; Figure 16 Figure 17 4.7 Homelessness	<p>a) Label Figures 16 and 17 or revise the titles of these figures, to clarify that the numbers on the vertical axis represent the homelessness population.</p> <p>b) On Figure 14, there are references to the plotted data such as "Santa Ana, Anaheim/Orange County," "San Bernardino City & County," "Riverside City and County," and "Oxnard, San Buenaventura/Ventura County." Please include a footnote explaining if the "County" references refer to the homeless population in county unincorporated territory in addition to the cities cited, to avoid a misinterpretation that it refers to the number of homeless in the entire county boundary. Also, the graph approach is very difficult to read and perhaps a table of the data would be a better approach to identify the change in the homeless population across the years.</p> <p>c) are the geographic areas reported for Health Care Agencies or some other type of agency? Please add the agency type to the title of Figure 16.</p>
50	Clarification	p. 21; paragraph 1	<p>"According to California Continuums of Care (COC), the unhoused population count for CoCs across the SCAG region were 53,729 in 2012 and <u>increased jumped</u> by 38 percent to over 74,000 in 2019. However, in 2021 the count dropped <u>significantly</u> to less than 23,000 and <u>then increased jumped</u> to almost 85,000 in 2022; meaning that the unhoused population <u>increased overall jumped</u> by 58 percent in the last decade <u>but is still lower than the 2006 count of XXXXX</u>. The reason for the 2021 fluctuation may be caused by undercounting due to the pandemic <u>and associated shutdowns</u>." Please add count for 2006 into narrative.</p>
51	Clarification	p. 22; paragraph 2; last sentence	<p>"In contrast, only 14,000 units were permitted at its lowest point in 2009, during the <u>low point peak</u> of the most recent housing recession."</p>
52	Clarification	p. 22, 23-24 Figure 18 Figure 19 5 Housing Production: Building Permits Issued versus Housing Units Permitted	<p>This entire discussion about how many building permits were issued in the SCAG region, for single- and multi-family units, needs to carefully be re-reviewed and revised, both in the narrative discussion and in Figures 18 and 19. Does the data represent the number of building permits issued, or the number of units that were permitted? Clarity on this issue is especially critical for multi-family development, where one building permit can be issued for one building that incorporates tens or hundreds of residential units within that one building. This clarity would also affect the conclusions about trends. What should be depicted is the number of units that were permitted, not the number of building permits issued. The latter has no real relevance to housing supply diversity, since it does not represent the total number of housing units that were constructed.</p> <p>a) For example, if the data represent the number of units permitted, then change the title of Figure 18 to: "SCAG Region <u>Number of Housing Units Permitted Building Permits Issued</u>" and "The share of total <u>units permitted permits</u> by housing type also fluctuated over the past four decades."</p> <p>b) Figure 19. SCAG Region <u>Shares of Housing Units Permitted by Type Building Permits Issued Percentage</u></p>
53	Clarification	p. 23; paragraph 2; last sentence	<p>"While one could conclude that the SCAG region collectively met a substantial portion of its total housing need, a significant percentage of affordable housing need was largely unmet as illustrated in Figure 19."</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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			<ul style="list-style-type: none"> Explain how the affordable housing need was unmet and how Figure 19 illustrates that.
54	Clarification	p. 24 Figure 20 5 Housing Production: 5th Cycle RHNA	<p>The discussion on the 5th cycle RHNA should:</p> <p>a) first reference that this discussion is HCD information on the 5th RHNA cycle, and should also include information on the dates of the planning period of the 5th RHNA cycle, in addition to the 6th RHNA cycle, to give the reader some context.</p> <p>b) What does "fulfillment" mean? Is it the number of building permits issued, or residential units finalized? Change title to "Figure 20. SCAG Region 5th Cycle RHNA <u>Share of Income</u> Category Fulfillment <u>Percentage(Units Permitted)</u>"</p>
55	Clarification	p. 24; paragraph 2	<p>"The trend of producing only a small portion of affordable housing combined with factors such as homelessness, and for communities of color lower homeownership rates and increased cost-burden, overcrowding, and substandard housing, suggest a problem that extends beyond supply and demand." First sentence is difficult to understand. Reword or use additional punctuation to clarify.</p>
56	Clarification	p. 25 Figure 21 Paragraph 2 5.2 Challenges in Meeting Housing Needs	<p>The narrative in this section discusses the ratio of housing units produced per persons added to the region, over five distinct decades. When discussing how the ratio of units to population increased or decreased, is the correct relationship being understood? Would the use of the term "improved" or "worsened" be clearer?</p> <p>Change title to "Figure 21. SCAG Region <u>Housing Unit</u> vs. Population <u>Growth</u> Comparison"</p>
57	Clarification	p. 26; paragraph 5	<p>"In addition to the new requirements of realistic development capacity, achieving compliance has also become stricter. Jurisdictions in the SCAG region that achieved compliance by October 2022 have until February 2025 to complete any necessary rezonings. Jurisdictions that did not achieve compliance by October 2022 must now complete necessary rezonings before they can receive HCD approval. This poses a problem for jurisdictions that need funding to implement their housing element but cannot achieve the grant requirement of housing element compliance due to the inability to undertake the rezonings."</p> <ul style="list-style-type: none"> Language regarding deadlines for rezoning is not consistent across RTP documents. Review and ensure correct dates are reported across all documents. Is the February 2025 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned and inconsistent with other documents and sections that mention an October 2024 deadline. Please check dates against statute and update as applicable throughout all documents regarding this topic.
58	Clarification	p. 26; paragraph 6	<p>"In the early 21st century, expansion on the urban fringe continued in some places, though the region's fragile and rugged natural landscape—as well as sheer distances—present substantial limits."</p> <ul style="list-style-type: none"> Remove "fragile" or expand on what this means

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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59	Clarification	p. 27; paragraph 4	“Beyond planning challenges, the cost of building residential units is another primary barrier to meet housing need. Not only does it include construction costs, such as the cost of land, materials, and labor, but jurisdictional processes, <u>state mandates</u> , and environmental requirements can also add cost to the process.”
60	Clarification	p. 27; paragraph 7; sentence 2	“Issues such as a smaller workforce pool after the last recession <u>in 20xx</u> , an aging workforce where one in five workers is currently over 55, and strong competition from related...” <ul style="list-style-type: none"> Specify which recession is being referred to.
61	Clarification	p. 28; Table 2	“Table 2. California Cost Construction <u>Costs</u> Annual Percentage Change” <ul style="list-style-type: none"> Are these all types of construction or just housing? Perhaps include clarification in title.
62	Clarification	p. 29 Section 5.2	The Insufficient Resources discussion states that a lack of local jurisdiction staffing or funding to implement affordable programs or design zoning codes can be a restriction to encouraging housing production. Please cite the survey or source of this conclusion.
63	Clarification	p. 30 5.2 Challenges in Meeting Housing Needs: Development and Impact Fees	In the discussion on development impact fees on page 30, reference is made to needing these fees "to support the approval of the development such as staff time for permitting, inspections." There may be confusion between a local jurisdiction imposing a processing fee, where the fee is used to cover the cost of staff time to review and process the development application and associated environmental analyses, versus a development impact fee, which is used to assess a pro rata share of fees to cover local, county or regional need for schools, parks, or infrastructure that are needed to support the increased population generated by the proposed project.
64	Clarification	p. 31; paragraph 2	“As illustrated in previous sections, <u>multiple factors that are found throughout the planning and building process contribute to the causes of the housing crisis</u> are at various points in the process to plan and build housing The following section describes a snapshot of funding for planning and building housing, technical assistance offered by SCAG, and strategies implementable by local jurisdictions— <u>all of which may contribute to increasing the</u> —all various ways to increase housing supply. ”
65	Clarification	p. 32; paragraph 2	“SB 2 also established the Permanent <u>Local Housing Allocation (PLHAPHLA) program</u> . Under this grant, the amount of PLHA funding for entitlement jurisdictions is based on the formula funding for the Community Development Block Grant (CDBG) Program for a five-year period, and through a competitive grant program to non-entitlement jurisdictions. As of Round 3, all awarded applicants in the SCAG region were entitlement jurisdictions....” <ul style="list-style-type: none"> Briefly explain what ‘non-entitlement’ and ‘entitlement’ jurisdictions are and if this means that some agencies qualify under certain parameters or not. Perhaps refer reader to location to find more detailed information.
66	Clarification	p. 37; paragraph 1	“There are a variety of strategies and tools that local jurisdictions and stakeholders can employ to plan for and <u>facilitate the building of build housing</u> .”

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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67	Clarification	p. 37; paragraph 5	<p>“15-minute communities draw social and economic resilience benefits that address shocks and stressors including households with limited mobility options, the age dependency ratio, and limited tree canopy/urban heat island effect.”</p> <p>Do 15-minute communities draw or create benefits?</p>
68	Clarification	p. 38; Figure 23	<p>Figure title suggests data is broken out by race and ethnicity; please clarify if all groups listed mutually exclusive or if it is ‘select racial/ethnic’ categories being reported if only Whites are broken out as being Hispanic or not. Figure should be labeled accordingly with “non-Hispanic” for each category other than Hispanic or Latino if the data actually reflect race categories broken out by Hispanic/Latino ethnicity. A note should be added to the Figure if only the White category is non-Hispanic and all others may include Hispanics or Latinos.</p>
69	Clarification	p. 39; Age dependency ratio	<p>The narrative discusses the age dependency ratio as being “measured by the percentage of the population younger than 20 years old and older than 64.” The typical age dependency ratio is the population under 15 and 65+. Please verify SCAG’s definition and if ratio used deviates from traditional ratio, explain why the ratio was changed.</p>
70	Clarification	p. 39, 40 Figure 25 7 Best Practices for Jurisdictions and Stakeholders: Tree Canopy	<p>Please clarify how an area that is or is not covered by tree canopy, is determined. Is this done on a parcel-by-parcel basis, or the number of trees located by area or acreage, or other factor? Please provide a summary of the State Department of Public Health's methodology, given that the SCAG region is identified as having more than 90% of its acre not covered by tree canopy. Also, perhaps there should be some discussion about the breadth of geography that the SCAG region encompasses, which includes high desert communities.</p>
71	Clarification	p. 39; paragraph 2	<p>“These communities are more susceptible to the effects of extreme heat events and offer less carbon sequestration, making the community overall a less pleasant place to engage in activities.”</p> <ul style="list-style-type: none"> • Please clarify if ‘activities’ include everything or if it is referring to physical and/or outdoor activities.
72	Clarification	p. 40; Figure 25	<p>Include year of data being reported in title and source.</p>
73	Clarification	p. 41; paragraph 1	<p>“Once inefficiencies are identified, jurisdictions can implement strategies such as consolidating the review process, creating multiple points of entry to secure a building permit, creating an expedited process for certain types of projects such as affordable housing, updating permitting software, and lowering the threshold for project to receive a ministerial permit.³²”</p> <ul style="list-style-type: none"> • What are “multiple points of entry to secure a building permit”?
74	7.4 Housing Supportive Infrastructure	p. 42	<p>The second paragraph on page 42 states “Moreover, many jurisdictions do not have an updated to date assessment of their utility infrastructure.....”. Perhaps this should read “updated assessment” or “up-to-date assessment”?</p>
75	Clarification	p. 44	<p>Ensure language of regional planning policies is the same as in the main Connect SoCal document.</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All maps	All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific technical report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.
2	General Comment	All maps with growth forecast and development types data	Add language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”
3	General Comment	All pages	Add “2024” to all technical report page headers’ titles
4	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
5	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
6	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
7	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
8	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
9	General Comment	All pages	Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency’s legal boundary, otherwise known as “Spheres of Influence” the growth must be feasible
10	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
11	Clarification	All pages	Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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			<p>example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.”</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>
12	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”
13	General Comment	All pages	<p>The phrase “natural and farmlands” is used throughout this and other documents. To clarify, amend phrasing, e.g., ‘natural lands and farm lands’ or ‘natural and farm lands’. Example on page 2 paragraph 2 second sentence: “This chapter also covers climate resilience, and natural and farmland preservation, and complete communities”... where the current wording language does not make sense to say “...and natural preservation”</p> <p>Please revise phrasing and proliferate throughout all documents.</p>
14	Clarification	p. 1; bullet 1	“Regional Housing Needs Assessment (RHNA), the state-mandated state mandated vehicle for identifying <u>and allocating</u> housing need in the state.”
15	Clarification	p. 1; bullet 5 on page	“SCAG’s Racial Equity Early Action Plan, defined racial equity for SCAG and established a series of goals and strategies for SCAG to advance racial equity in the region. The Racial Equity Early Action Plan has spurred additional racial equity centered work including the convening of the Racial Equity and Regional Planning Subcommittee, <u>which</u> developed a series of recommendations to advance racial equity in the Plan. These recommendations are reflected throughout the Plan.”
16	Clarification	p. 2; paragraph 1; sentence 4	“The Local Data Exchange process informed the FRDP through a series of touchpoints with local jurisdictions where they were presented with information on project growth in their jurisdictions for input to ensure <u>entitlements were accurately reflected and the PDAs and GRRAs were considered</u> these assumptions were reflected in local plans. ”
17	Clarification	p. 4; paragraph 2; sentence 1 last sentence	<p>“Under SB 375, SCAG’s role is to coordinate the development of the Connect SoCal 2024 land use pattern in partnership with local jurisdictions that are ultimately responsible for <u>land use planning and management</u> implementing it.”</p> <p>“This included information on land use, transportation, priority development areas, geographical boundaries, resource areas, and growth that was shared and exchanged through a combination of one-on-one meetings <u>with</u> and data submissions from with local jurisdictions.”</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
18	Clarification	p. 5; bullet 5	<p>“Did the MPO/RTPA who has federal lands within its jurisdictional boundary involve the federal land management agencies during the preparation of the RTP? (23 CFR 450.316(d))”</p> <ul style="list-style-type: none"> Define RTPA
19	Revision	P.6, paragraph 2	<p>In the second paragraph, revise the first sentence to include the following language: Under SB 375, SCAG’s role is to coordinate the development of the Connect SoCal 2024 land use pattern in partnership with local jurisdictions that are ultimately responsible for implementing it, <u>where applicable and feasible.</u></p>
20	Clarification	p. 6; paragraph 4; sentence 1	<p>“Put simply, the emphasis of RHNA in the 6th sixth cycle expanded to a more comprehensive assessment of the need for housing: <u>explicitly addressing</u> the existing need plus the need to house anticipated population growth. In prior cycles it focused on need due to anticipated population growth, <u>which addressed existing need through adjusting future households.</u>”</p>
21	Clarification	p. 6; paragraph 5; sentence 2	<p>“Some local updates are not due to HCD until October 2024 and at the time of the LDX conclusion <u>in December 2022</u>, only 84 of 197 jurisdictions had an adopted and certified housing element.”</p> <ul style="list-style-type: none"> Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic.
22	Clarification	p. 10; paragraph 2; sentence 1-2	<p>“In the early twenty-first century, expansion on the urban fringe has continued in some places, though the region’s fragile and rugged natural landscape—as well as sheer distances—present substantial limits. As a result, there has been an increase in infill development and a higher share of new housing consisting of multifamily units in existing communities since the Great Recession, <u>due in part to less available land to build on.</u>”</p> <ul style="list-style-type: none"> Remove “fragile” or expand on what this means
23	Clarification	p. 10; paragraph 6; last line	<p>“From 2012 to 2019, new development throughout the region resulted in the amount of natural lands decreasing by roughly 50,000 acres, or 0.2 percent. Household and employment growth that degrades or develops vital habitats reduces the environmental services they provide us that are crucial to our regional economy, health, and overall quality of life.”</p> <ul style="list-style-type: none"> Define ‘natural lands’ and provide source Define ‘vital habitats’ and provide source
24	Clarification	p. 11; paragraph 2; sentence 2	<p>“From 2012 to 2018, however, new development in areas with longstanding agricultural resulted in farmland decreasing in Southern California by more than 40,000 acres, or 3.5 percent.”</p> <ul style="list-style-type: none"> Was this land all zoned as agriculture or was it zoned for another use and temporarily used as agriculture? There are portions of the region where land is zoned for residential or commercial and temporarily being used as agriculture. Conversion of some agriculture land may also be due to rezoning to accommodate RHNA allocations.
25	Clarification	p. 11; paragraph 3; sentence 2	<p>“Additionally, development on natural and farmlands often occurs away from <u>existing</u> jobs, schools, retail, health care, and high-quality transit</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			service, leading residents to drive longer distances to access key destinations.”
26	Clarification	p. 12; map 1	<ul style="list-style-type: none"> • Map has poor resolution • Define ‘Protected Open Space Areas’ on the map page • Why are there several different data sources with different dates layered on top of one another?
27	Clarification	p. 15; paragraph 3; sentence 2	“As a result, <u>the most reasonable utilization and, where appropriate,</u> conservation of natural and farmlands is an important strategy to support SB 375 objectives. ”
28	Clarification	p. 15; paragraph 5	“Broadly speaking, growing sustainably requires growing <u>partly</u> in places and ways that achieve substantial housing growth within complete communities while <u>reasonably managing</u> minimizing growth at the urban fringe <u>and beyond</u> . <u>To a degree, h</u> Housing of various types can be located in areas that <u>which</u> promote location efficiency, good accessibility, and do not <u>result in the utilization of risk</u> natural lands or <u>risk</u> environmental hazards.”
29	Clarification	p. 18; table	<p>“Stressors: Chronic challenges that weaken natural, built, or human resources...</p> <ul style="list-style-type: none"> • Car-less Households” <ul style="list-style-type: none"> • Why is ‘car-less household’ a stressor? Aren’t car-less households encouraged by State to reduce GHG? What if the lack of automobile is a purposeful choice?
30	Clarification	p. 19; paragraph 2; last sentence	“SB 375 requires that Connect SoCal 2024 contain a Forecasted Regional Development Pattern (FRDP) —a growth vision—that can be shown to achieve GHG emissions reductions targets when combined with transportation network data and additional Plan strategies. The Connect SoCal 2024 growth visioning process integrated sustainability considerations into a preliminary development pattern. This was then shared with local jurisdictions through the Local Data Exchange (LDX) process, which is described more comprehensively in Section 5.5, for review and feedback and became the FRDP. This is a departure from previous plans where local review occurred much earlier in the plan development process, <u>and jurisdictions could only provide public comment about the growth forecast after SCAG’s visioning process and alternate growth forecasts were developed.</u> ”
31	Clarification	p. 19; paragraph 4; sentence 1	“The Regional Growth Forecast, described in detail in the Demographics and Growth Forecast Technical Report, is <u>the</u> starting point for the Connect SoCal 2024 growth vision.”
32	Clarification	p. 21; map 2	Add note specifying land use categories were standardized by SCAG.
33	Clarification	p. 23; paragraph 1	“The latest jurisdictional existing land use, general plan land use, and other data serve as the basis for future year population and household allocation in that they reflect supply. These measures of remaining capacity are matched with county and regional growth—demand—using growth—demand—using a mathematical approach. As such, the projection does not reflect a build-out scenario. Combining the general plan, existing land use, and 2020 Census data above indicate that in the aggregate, local plans in the SCAG region currently have a theoretical physical capacity of roughly 8.2 million housing units—several times higher than anticipated household

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			growth. <u>However, for these additional units to be realized, oftentimes the existing structures would have to be demolished and replaced with higher density developments.</u> Using this capacity as a starting point, the Regional Growth Vision:”
34	Clarification	p. 23; bullet 3; sentence 4	“Edits received on growth are often reflective of local general plans, local growth policies, <u>entitled and approved projects</u> , historic preservation, anticipated job growth, amongst several other factors.”
35	Clarification	p. 28; second bullet	“ Implement <u>Promote</u> the Forecasted Regional Development Pattern of Connect SoCal 2024, consisting of household and employment projections that have been reviewed and refined by jurisdictions and stakeholders to advance this shared framework for regional growth management planning...”
36	Clarification	p. 29; paragraph 3	“This data was mapped and functioned as a key informational resource during local review along with the PDAs. As a result of this process, growth in overlapping GRRAs has been de-emphasized but not completely <u>eliminated in eliminated</u> . in the Connect SoCal 2024 forecasted development pattern. <u>pattern.</u> ”
37	Clarification	p. 29; paragraph 5; sentences 3-4	“CoSMoS is an online mapping viewer that makes detailed predictions over large geographic scales of storm-induced coastal flooding and erosion for both current sea level rise (SLR) scenarios. The data included in this <u>technical report book</u> depicts the potential inundation of coastal areas resulting” <ul style="list-style-type: none"> • What are the “both” scenarios?
38	Clarification	p. 34; paragraph 3; sentence 2	“Local jurisdictions were then engaged for review and feedback that was then <u>incorporated</u> integrated to best reflect local plans and conditions.”
39	Clarification	p. 35; Map 6	Explain what is being shown or add a note referring the reader to the specific section that explains the map
40	Correction	p. 36; paragraph 1; sentence 4	“132 local jurisdictions provided input on SCAG’s draft growth forecast, while 148 percent provided input on other data elements such as GIS maps or surveys.” <ul style="list-style-type: none"> • Correct the 148 percent
41	Clarification	p. 37;	“Data– For the one question assessing data collected by local jurisdictions, the most common are: Local road pavement management and performance data (52 jurisdictions), Collision data (51 jurisdictions) and Pavement Condition Index (49 jurisdictions).” <ul style="list-style-type: none"> • Please clarify
42	Clarification	p. 37; paragraph 1	“To ensure that the local edits to the development pattern appeared on-track to reach SCS objectives, SCAG conducted a sketch-planning evaluation with the assistance of the Technical Working Group (TWG), <u>which this occurred prior to development of subsequent Connect SoCal 2024 strategies and modeling²⁶.</u> modeling²⁶ According to this evaluation, the FRDP has slightly less growth in the most prioritized areas (<u>steps 1-3 representing areas with more than one PDA and no GRRAs</u>) than the preliminary projection (steps 1-3 representing areas with more than one PDA and no GRRAs); however, its performance exceeded that of the final, adopted Connect SoCal 2020. Similarly, the share of growth in <u>areas with no more than one GRRAs</u> increased from 88 percent to 90 percent compared to the prior plan (Figure 1).”

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

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43	Clarification	p. 37; Figure 1	Add note under figure with definitions of acronyms as figures can be pulled out as standalone items. Change title or add note explaining more about what the figure represents.
44	Clarification	p. 37; Figure 1	“On April 20, 2023, the TWG discussed the FRDP and along with staff <u>and</u> it was determined to be sufficiently able to further the plan’s statutory objective to proceed with subsequent modeling and regional policy development.”
45	Clarification	p. 38; Map 7	<p>“Source: SCAG 2023. Priority areas refer to <u>an area with</u> more than one PDA and no GRRAs. Resource areas refer to two or more GRRAs.</p> <p>Add language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”</p>
46	Clarification	p. 39; paragraph 1; last sentence	“In addition, the region will <u>can</u> grow sustainably by incorporating climate resilience <u>strategies</u> and <u>promoting and reasonably pursuing</u> natural and farmland conservation, and broad complete communities strategies, including the concept of 15-minute communities.”
47	Clarification	p. 43; paragraph 1 under Natural and Farmland Preservation)	“Preserving <u>and most reasonably utilizing</u> the region’s natural and farmlands will ensure that future generations will be able to enjoy Southern California’s unique landscapes as we do, and benefit from the essential resources that natural lands provide.”
48	Clarification	p. 44; paragraph 3	“Connect SoCal anticipates <u>and projects</u> that some of the existing natural and farmlands in the region will convert to urban uses as the region grows to accommodate 1.6 million additional households.”
49	Clarification	p. 44; paragraph 5	“For natural lands, 48,590 acres are anticipated <u>and projected</u> to be converted to urban uses by 2050 from existing conditions. This represents 617 acres more than the Trend/Baseline and is consistent with jurisdictional feedback on locally anticipated growth. With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 18,032 acres of degraded habitat - 1,202 acres more than the Trend/Baseline. Some areas are improved, however, as Connect SoCal will result in <u>a projected</u> 1,891 acres of improved habitat - 666 acres more than the Trend/Baseline.”
50	Clarification	p. 44; paragraph 6	“For agricultural areas, specifically, implementation of Connect SoCal <u>would</u> will result in <u>the projected</u> conversion of 8,156 acres to urban uses - a <u>projected</u> loss of an additional 1,464 acres of farmland over the Trend/Baseline. There are <u>would be</u> economic impacts due to this projected

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			loss of farmland, where agricultural production value is anticipated to decline by roughly \$9 million through year 2050 compared to the Trend/Baseline. With this <u>Plan’s projected</u> loss of both natural and farmlands, groundwater recharge is anticipated to decline by 129,326 acre-feet - 24,862 more acre-feet than the Trend/Baseline scenario.”
51	Clarification	p. 46	Asterisks are used in the bulleted lists but are not explained. Please explain.
52	Clarification	p. 47; paragraph 2	<p>“Tax increment financing which includes but is not limited to Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), Neighborhood Infill Finance and Transit Improvements Districts (NIFTIs), and Affordable Housing Authorities (AHAs) is a tool that can allow local jurisdictions and public agencies to collaborate on achieving infrastructure, mobility, economic development, sustainability, and housing goals by leveraging tax increment (captures generated property tax as a result of invested dollars) to fund multifamily affordable housing, transit/rail capital projects, Transit-Oriented Development, Complete Streets capital projects, parking, parks and open space, and programs to reduce GHG emissions and VMT within TPAs. SCAG has supported <u>the</u> establishment of several EIFD districts in the SCAG region through funding and technical assistance programs.”</p> <ul style="list-style-type: none"> • Sentence 1 is a very long sentence. Try to break up if possible.
53	Clarification	p. 50; last bullet	“ Support the development of Develop housing in areas with existing and planned infrastructure, availability of multimodal options, and where a critical mass of activity can promote location efficiency.
54	Clarification	p. 51	What is the reduction in GHG? This should be called out
55	Clarification	p. 51; bullet 2	<p>“Improved pedestrian infrastructure - Pedestrian oriented design can create a more accessible and connected environment to key destinations and activity centers, increase transit ridership, and reduce the number of single-occupant trips. Continuous and cohesive sidewalk networks improve the safety and comfort of streets, enabling people of all ages and abilities to get where they want to go. Improving walkability often means <u>installing</u> implementing new sidewalks, improving the quality of existing sidewalks and including street trees and other amenities.”</p>
56	Clarification	p. 51; bullet 3	<p>“Co-working ...This strategy was developed using a very conservative assumption that a small portion of long-distance commuters would substitute a single day per week of their commute for a co-working site within three miles of their home.”</p> <ul style="list-style-type: none"> • Are these co-working sites new? Informal? Is there some sort of inventory of these now? Are more expected/planned?
57	Clarification	p. 58; bullet list	What are LDCs?
58	Clarification	p. 58	<p>Add new section: “7.5 TAZ-Level Growth Forecast, Growth Vision, and SCS Consistency In order to assess the ability of the Connect SoCal 2024 Plan to meet federal air quality standards and achieve a state greenhouse gas reduction target, SCAG creates small-area projections data for housing, population, and employment, which are known as the Tier 2 traffic analysis zone (TAZ) socioeconomic dataset (SED). Although these data are based in part on input provided by staff from local jurisdictions during the Connect SoCal 2024 Local Data Exchange process, local jurisdictions and projects within</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<p>the region shall not be held to meet any specific numbers within or aggregates of the TAZ data. Connect SoCal 2024’s TAZ-level household and employment projections are created to provide estimated snapshots in time. These projections do not reflect subsequently available information (given that local jurisdictions provided their local input to SCAG between May and December 2022); and, concerning some jurisdictions, they also do not reflect all currently entitled and pending projects. Additionally, the TAZ data do not project the full build-out and realization of localities’ general plans; and they do not conform to jurisdictions’ current respective housing elements. The local plans and approvals have continued and will continue to evolve; and market forces will continue to play a major role in determining the timing, locations, and different types of development and redevelopment that will occur. Therefore, the applicable jurisdiction(s) should be contacted for the most up-to-date data available.</p> <p>The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.</p> <p>SCAG’s forecasted regional development pattern (FRDP) is not solely based on the TAZ-level household and employment spatial projections. It is utilized to estimate the overall effect of the many policies, goals, and strategies of Connect SoCal—which should not be uncritically applied, individually or en masse, to any particular project or plan. The TAZ-level household and employment growth projections support the region’s ability to model conformity with federal air quality standards and its ability to achieve a state greenhouse gas reduction target; they do not, however, reflect the only set of growth assumptions that may meet these standards and that target.</p> <p>Therefore, insofar as housing and other laws or grants may require comparisons of projects or plans to Connect SoCal 2024, SCAG’s projections that are illustrated in TAZ maps—along with any related documents or modeling outputs—may not be used to determine the inconsistency of any plan or project in the region with Connect SoCal 2024. Given that land use decisions are properly made with attention to local contexts and circumstances, local jurisdictions and other lead agencies shall have the sole discretion to determine a local project’s or plan’s general consistency and overall alignment with Connect SoCal.</p> <p>For example, local jurisdictions’ plans and approvals may be found to align with Connect SoCal 2024 if they directionally support a number of its objectives, such as by encouraging a mix of housing types that includes</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<p>more affordable and multi-family housing rather than solely single-family, for-sale housing; providing for more housing located proximate to employment or vice versa; or encouraging increased use of transit, ridesharing, biking, walking or micro-mobility, or hybrid and remote work to reduce commuting trips. Such alignment is an appropriate basis for a local jurisdiction to determine that a plan or project is consistent with Connect SoCal 2024. Such determinations should be evaluated based on (i) the totality of the goals, policies, and objectives of Connect SoCal 2024 and its associated Program Environmental Impact Report (PEIR), and (ii) the attributes of the local project or plan in overall relation to Connect SoCal, and not in a prescriptive manner by applying SCAG’s TAZ-level data, any aggregate thereof, or any particular one or more goals, policies, or objectives of Connect SoCal 2024 and its associated PEIR.</p> <p>This flows logically from the fact that Connect SoCal 2024 includes dozens of stated directives, policies, goals, objectives, and measurements, any number of which may not be individually applicable to any given project or plan. For example, a project that provides new housing units in conformity with a jurisdiction’s approved housing element can and should be found to be in overall alignment with Connect SoCal 2024 given housing production’s contribution to Connect SoCal 2024 goals and policies, especially those related to affirmatively furthering fair housing, social and economic justice, jobs-housing balance, and the like.</p> <p>Household or employment growth included in the Connect SoCal 2024 TAZ-level SED and maps may assist in determining consistency with the SCS for purposes of determining a project’s eligibility for CEQA streamlining under SB 375 (Cal. Govt. Code § 21155(a)). TAZ-level maps and data may not otherwise be used or applied prescriptively to determine that a project is inconsistent or not in alignment with Connect SoCal 2024 for any purpose, given that myriad other development assumptions could also be found to be consistent or, on balance, aligned with the SCS. Specifically, the TAZ-level data and maps do not supersede or otherwise affect locally approved housing elements, including those adopted in compliance with the 6th Cycle of the Regional Housing Needs Assessment (RHNA).”</p>
59	Clarification	p. 59	SCAG should explain on this page how we are meeting the GHG reduction targets. Supply the metric associated with Land Use
60	Clarification	p. 61; endnote	<p>“25-At the time of <u>the release of the initial growth preliminary forecast development (April May 2022)</u>, only 12 of the region’s 197 jurisdictions had 6th cycle housing elements which <u>that</u> had been adopted and certified by the state. While local jurisdictions were requested to consider housing element updates in their review of LDX growth data, only 87 had adopted and certified housing elements even <u>by</u> the January 2023, immediately after the deadline for LDX input. Additionally, some local jurisdictions may not be required to complete rezonings associated with housing element updates until October 2024, rendering data on newly available sites inherently incomplete (or unavailable) for the purposes of Connect SoCal 2024.</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none"> Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic.

Table 11. MOBILITY TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1.	General Comment	All pages	Add "2024" to all technical report page headers' titles
2.	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3.	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
4.	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5.	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6.	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7.	General Comment	All pages	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
10.	Revision	Map 2-6	The map should be categorized by County and provided at a more enhanced scale.
11.	Clarification	P.22	The Report indicate that there would be an 80.4 percent increase in transit/rail boardings per capita associated with Connect SoCal implementation. Given that current data shows that transit/rail boardings have significantly declined in recent years, how is this significant increase supported by data?
12.	Deletion	P. 29	Provide clarification of the symbol used after footnote 30. The symbol should be removed if it is not applicable.
13.	Clarification	P. 86	Clarify why there are different colored fonts used in the last bullet point.
14.	4.3.2: Existing Transportation System: Local Streets and Roads	p. 205	Please clarify if the definition and discussion on local streets and roads pertains only to public local streets and roads, or if it also includes privately-owned streets. With the discussion on maintenance needs and funding sources, it appears that the discussion pertains to only public local streets and roads, and the reference to "public" is recommended to be included in the narrative.
15.	4.6.1: Declining Infrastructure	Figure 4-4, p. 211	Figure 4.4: 2022 Bridge Conditions in the SCAG Region, is missing an information label for the "Y" axis. What do these numbers on bridge condition for each of the six SCAG counties represent?
16.	4.6.2: Congestion and Delay:	p. 212, 213; Figure 4-6	The narrative discussing person hours of delay by facility type (page 212, last paragraph) does not match with the information presented in the corresponding Figure 4-6 on page 213. Please re-check the percentages

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
	Daily Person Hours of Delay		<p>called out in the narrative, against the calculation of percentages with the data in Figure 4-6 on daily person-hours of delay between Base Line (2050) and the Plan (2050).</p> <p>“Connect SoCal 2024 plan investments are estimated to decrease daily person-hours of delay of 17 percent overall, highway and 21.7 percent on highways and 8 percent on arterials compared to <u>Base Year Baseline</u> conditions.” Or “Connect SoCal 2024 plan investments are estimated to decrease daily person-hours of delay of 20.17 17 percent overall, highway and <u>19.2</u> 21.7 percent on highways and <u>17.8</u> 8 percent on arterials compared to Baseline conditions.”</p>
17.	4.6.2: Congestion and Delay: Truck Delay by Facility Type	p. 213, 214 Figure 4-7	<p>The narrative discussing average daily truck delay by facility type (page 213, last paragraph) does not match with the information presented in the corresponding Figure 4-7 on page 214. Please re-check the percentages called out in the narrative, against the calculation of percentages with the data in Figure 4-7 on truck delay <u>by facility type</u>, between Base Line (2050) and the Plan (2050).</p> <p>“Connect SoCal 2024 is estimated to reduce truck delay by 19 percent over Baseline conditions for the category of highway/expressway, with <u>13.8</u> 18.1 percent over Baseline conditions for the arterials <u>and 18.1 percent overall.</u>”</p>
18.	4.6.6: Speed Management	p. 217	<p>The last paragraph of this section discusses AB 645's pilot program for speed management. Since several SCAG local jurisdictions will be participating in the pilot program, a call-out of the participating jurisdictions is recommended.</p>
19.	4.9.3: Performance Measure 2: Pavement and Bridge	p. 228, 229 Figure 4-10: State Figure 4-11: SCAG	<p>The narrative on page 228 discusses the pavement conditions of the State and SCAG region, for roads and bridges. Noting that most of the pavement condition falls within the Fair category, is there a reason why Figure 4-10 and Figure 4-11 do not display any information on the Fair Category, and only focus on the Good and Poor pavement and bridge conditions?</p>
20.	4.10: Where Do We Go From Here? 4.10.4 Smart Cities	p. 233, 235	<p>The first full paragraph on page 233 states that "...the cost of rebuilding roadways <u>pavement</u> could be 14 times more than preventive maintenance."</p> <p>Later, on page 236, third bullet, the technical report states that "The cost of rebuilding roadways <u>pavement</u> is exceptionally more (up to eight times more) than preventative maintenance."</p> <p>Please re-examine the differing percentages, and reconcile.</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

Table 12. PERFORMANCE MONITORING TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add "2024" to all technical report page headers' titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	General Comment	All pages	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
8	Clarification	p. 2; paragraph 1 Section 1.2: Connect SoCal 2024 Performance Summary	"The plan performance assessment demonstrates that implementation of Connect SoCal 2024 will propel the region toward achievement of the identified goals for <i>nearly</i> every identified plan performance measure." Please add narrative in the above paragraph or use another technique such as the use of asterisks within Table 1 (Connect SoCal 2024 Performance Assessment Results), to identify which performance measures do <u>not</u> achieve identified goals. This will greatly assist the reader from having to go through each of the performance measures in Table 1 to arrive at the answer.
9	Clarification	p. 3 Average trip distance (all modes)	Table 1: Connect SoCal 2024 Performance Assessment Results In the Average trip distance (all modes) performance measure, is "miles" the measure that is used for the average trip distance shown in the reporting years? If so, please add the reference to "miles" in the appropriate table columns for this measure.
10	Clarification	p. 6 Share of Population Living in PDAs Table 2: Connect SoCal 2024 Co- Benefits	Clarification is requested on the identification of "Savings" and "Change" for the Benefit Category of "Share of Population Living in PDAs". The Savings is identified as a 3.3% higher share of population living in PDAs, when comparing Connect SoCal to the Baseline. However, on the "Change" column, the entry is "+3.3 pct pts". Is that not the same as saying +3.3%?
11	Clarification	p. 17, p. 72 ADU Development	In Table 6, this ADU-related performance measure is described as "Number of ADU units <i>developed</i> within Priority Development Areas (PDAs)." Further, within the page 72 narrative on this performance measure, the text states that "This new metric will track the number of ADUs <i>developed</i>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
		Table 6: Connect SoCal 2024 On-Going Monitoring Performance Measures	<p>in each county within the SCAG region over the Connect SoCal 2024 plan horizon."</p> <p>If this is to be a tracking measure, SCAG should clearly define what it is that would be tracked and use that descriptor in Table 6 and in the narrative on page 72. For example, is the tracking measure to be ADU approvals? Building permits? Building finals?</p>
12	Clarification	p. 17, p. 75 Urban Heat Island Reduction Strategies Table 6:	<p>In Table 6, there is an "Urban Heat Island Reduction Strategies" performance measure.</p> <p>The description provided in Table 6 and further discussed on page 75 identifies that the strategy is based on the implementation of urban tree canopy. How will this data be captured by SCAG, to be able to report on progress of this performance measure? Is there a specific data source(s) that would be used, or is this to be based on information from local governments in the SCAG region? Please clarify.</p>
13	Correction	p. 45	<p>Repetitive language "Priority Development Areas (PDAs) are areas that offer high levels of accessibility and connectivity to job centers and other primary destinations and opportunities that offer high levels of accessibility and connectivity to job centers and other primary destinations and opportunities."</p>
14	Clarification	p. 69	<p>The housing crisis not just in California or SCAG region. Change to "Due to the housing crisis, <u>which is not limited to just in Southern California or the SCAG region...</u>"</p>
15	Clarification	p. 87	<p>The analysis for the increase in bicycle-related serious injuries and fatalities should consider and discuss the increased use of e-bikes, especially the increased use of e-bikes by people of a younger age and less decision-making skills. This may be evidenced by looking at the age of the injured/killed and referencing recent attempts at licensing in state legislation. In addition to Connect SoCal 2024 serving "as a catalyst toward improved regional bicycle safety performance", can it (or SCAG) also serve as a catalyst for bicycle safety education and/or licensing?</p>
16	Clarification	p. 113-114 Section 7.4.3 GHG Emissions Reduction Measure	<p>The narrative states that "A new performance measure was proposed for inclusion in the PM 3 program that will require the monitoring and reporting of surface transportation-related GHG emissions reductions." The narrative further states that "the proposed new GHG emissions reduction performance measure would require Caltrans to establish two- and four-year statewide targets, while SCAG would establish four-year regional targets for reducing tailpipe CO2 emissions on the NHS."</p> <p>The narrative further states that final FHWA rulemaking is expected in November 2023.</p> <p>At present, is it correct to state that: a) the current inventory of performance measures presented in this Technical Report does not include this new federal GHG performance measure;</p>

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<p>b) the GHG Emissions performance measure listed in Table 4: Connect SoCal 2024 Plan Performance Assessment Measures (page 11), is the California Air Resources Board's GHG emissions reduction target for the SCAG region; and,</p> <p>c) the new federal GHG emissions reduction target could possibly be added to this Technical Report as a new performance measure, if the federal Rulemaking is accomplished in time?</p>

Table 13. PROJECT LIST TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add "2024" to all technical report page headers' titles
2	Correction	All Pages 2-430	Change "\$1000's" to "\$1,000s"
3	Correction	p. 100; Table 1	Table 1, Row 9, ORA111207, Project cost should be \$423,000 (per FTIP amendment #23-11)
4	Revision	P.105; FTIP ID ORA 210601	<p>The "OC Maintenance Facility" identified on page 105 of the Connect SoCal Plan Project List is located within the City of Irvine and is subject to the approval of a Conditional Use Permit.</p> <p>Recommendation: Add the following footnote to the "OC Maintenance Facility" identified on page 105 of the Connect SoCal Plan Project List: <u>"The OC Maintenance Facility is subject to the approval of a Conditional Use Permit from the City of Irvine."</u></p>
5	Correction	p. 257	RTP ID 2T01135, Lead Agency should be "Various Agencies" and Project Cost should be \$423,000

Table 14. PUBLIC PARTICIPATION AND CONSULTATION TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add "2024" to all technical report page headers' titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	p. 10; Section 9.1. Survey Findings, first sentence	Clarify if respondents had the opportunity to take the survey more than once. If so, did the 3,683 “completed surveys” actually come from 3,683 respondents? If not, that should be mentioned in the paragraph.
7	Clarification	p. 10; Figure 1. Survey Responses by County	Figure 1 shows that 50% of the survey respondents came from the County of LA. As such, the response are skewed and more LA-centric, which should be noted somewhere in this technical report when discussing survey results.

Table 15. TRANSPORTATION CONFORMITY ANALYSIS TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add “2024” to all technical report page headers’ titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.
8	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”
9	Correction	p. 23 & 41 (2 occurrences)	“2020 Decennial Census PL-94 171 Redistricting File” Change to “2020 Decennial Census P.L. 94-171 Redistricting File”

Table 16. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	All pages	Add “2024” to all technical report page headers’ titles
2	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			Local Profiles if original data source is U.S. Census Bureau American Community Survey data
3	General Comment	All pages	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
4	General Comment	All pages	For data that is not derived from Connect SoCal models, cite source.
5	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.
7	Clarification	p. 1, first paragraph	“However, the IJA expires in Fiscal Year (FY)..” – specify it is “Federal” fiscal year.
8	Clarification	p. 1; 1. Introduction: Revenue sources	Page 1, third paragraph, states that "Efforts are underway to explore how we can transition from our current system based on fuel taxes towards a more direct system of user fees." This sentence seems to downplay/contradict a preceding sentence which recognizes that local sales tax revenues for transportation purposes generate 58% of the region's core revenues, and highway tolls an additional 8%, according to Figure 6, page 10. Perhaps revise the reference of "based on" to a more appropriate reference.
9	Clarification	p. 2 1. Introduction: Equity Considerations of User Rees	Page 2, first full paragraph, states that "SCAG further considers the potential equity concerns that accompany user fee policies and assumes mitigation measures such as the establishment of a mobility equity fund." Please clarify; in reviewing the mitigation measures in the Draft Program EIR, there does not seem to be any mitigation measure that addresses the equity considerations associated with any user-fee system of revenues (See PMM-TRA-2). Please also see related comments that are provided on the Draft Plan Equity Technical Report.
10	Clarification	P. 7, Sec 2.6 P. 9, Table 1 P. 16, Table 3.1 Core Revenues - Local	Section 2.6 acknowledged that local sales taxes for three counties will expire during the term of the Plan, including Orange County’s Measure M in 2041. However, the core revenue forecast shown in Table 1 show a significant increase in funding in OC for the period of FY2045-2050 (\$25.1 billions in FY2045-2050 compared to \$18.3 billions in FY 2040-2044 and \$17.6 billions in FY2035-2039. Recommend providing clarifying information on the disproportionate increase and local sales taxes assumptions beyond their expiration. If a continuation of existing sales tax revenue (or other new taxes) is assumed through FY2045-2050, recommend categorizing this revenue under new reasonably available revenues to better illustrate the need to secure future funding.
11	General comment	p. 8, Appendix 1, p. 3	Core and Reasonably Available Revenues, identify federal, state and local sources of transportation funding for the plan and Highway Tolls identify toll road revenues and mitigation fees. Nowhere in the document is the private sector funding contribution assumed for the plan described, although toll road widenings, and tolled express lane facilities that are privately funded are included in the plan and in the total cost of the plan. Accurately describing the extent of private funding is an important public

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			disclosure, and an important element of the financial plan that relieves the burden on limited federal, state and local transportation funding.
12	Clarification	p. 11 & 12; Figure 8 3.1: Core Revenues Federal	The narrative on Federal sources of core revenues on page 11 states that FTA Formula and Discretionary funds cumulatively account for 61% of the federal funding for the SCAG region. Please confirm. In reviewing the referenced Figure 8, the sum of the two funds appears to be 58%.
13	Clarification	p. 12, 13 Tables 2-4 Table 3.4 3.2: New Reasonably Available Revenues: Mileage-Based User Fee (Replacement) vs Local Road Charge Program	a) This section of the technical report should include a figure, similar to Figures 1 through 8, that visually identify the amount of new revenue and the associated percentage of the total new revenues, that are being assumed and listed in Tables 2 - 4. And that per Figure 12 on page 33, new revenues represent \$162.2 million or 22% of the Connect SoCal 2024 total revenues of \$750 billion. b) The narrative discussion on New Reasonably Available Revenues on page 13 could also warrant more clarifying explanation about the distinction between the Mileage-based User Fee (Replacement) and the Local Road Charge Program. Technically, both are mileage-based fee programs: summarize the distinctions that are discussed in Tables 2 and 4, to assist the reader who is not going to delve into the detail of those tables, yet recognizing that both fees could be imposed on the driver starting in 2035. c) Table 4 includes a risk assessment of the proposed new sources of funding. The information in Table 4 should be referenced in the narrative discussion on page 13, to inform the reader of the potential risk analysis that was conducted for each new funding source and the risk mitigation measures identified.
14	Clarification	P. 14-15, Table 2	While the number is available later in the report, Table 2 should include the total sum of new reasonably available revenue.
15	Clarification	p. 26 4. Expenditures	a) Page 26 of this section references a Figure 11 that represents the standardized template that the CTCs used to submit cost information for capital projects. Is it Figure 11 on page 32, or Figure 9 on page 26, that represents the standardized CTC template? b) Page 26 of this section references a Figure 12 to illustrate changes in California highway construction costs. Is it Figure 12 on page 33 or Figure 10 on page 21, that represents the change in California construction costs?
16	Clarification	P. 28, Table 5 P. 31, Table 6 Expenditure	Both Table 5 and Table 6 refer to service expansion. Recommend adding language that differentiates what is included in each table. For example, specify infrastructure and equipment required for service expansion in Table 5. Also clarify if operating costs are included in Table 6 as the text description before it only suggests system preservation and maintenance needs.
17	Correction	p. 29	Table 5, Highways, Add toll roads to HOV/Express Lanes/ Toll Roads . This change should also be made elsewhere in the main RTP/SCS document where highways and express lanes are discussed. Revise Description to include auxiliary lanes, general purpose lanes, carpool lanes, toll roads, toll lanes, and Express/HOT lanes.
18	Clarification	p. 30, 31	This section, second paragraph, outlines different factors that impact/damage roadways. One issue that has surfaced at SCAG policy

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		4.3 MultiModal System Preservation and Maintenance	committee meetings, but which is not addressed herein, is the impact of EV vehicle weight on roadway pavement conditions. Please identify if this is a valid issue that merits discussion as a potential contributing factor to pavement distress during the 20+ year of the Plan.
19	Clarification	p. 30-31, Section 4.3 Multimodal System O&M	Descriptions in this section mainly focus on street preservation and only touch lightly on preservation of transit assets. The funding need for transit, however, is at least twice that of streets and roads. Suggest adding descriptions of existing transit needs (e.g. there are X number of buses and rail cars in our region that must be maintained in good working order as well as X miles of track infrastructure).
20	Clarification	p. 31, last paragraph	"... maintain exiting transit" should be "existing".
21	Clarification	p. 34-35, Table 7 Revenues	There is a significant increase in revenues between the 2040-44 and 2045-49 periods, greater than any other time period. The increase seems exaggerated and requires further verification and clarification. Is the disproportionate forecast due to inflationary increase?
22	Clarification	p. 7; Appendix 1, page 1 Local Option Sales Tax Measures	The overview of the local sales tax measures that are factored into the Local Core Revenue Sources, identifies that several county sales tax measures will expire during the forecast period of Connect SoCal 2024. Under the "Real Growth Rate" percentages by county in Appendix 1, would it be appropriate to further identify that this real growth rate is being applied up to the year of any applicable sales tax expiration? Also please note there is a duplicative sentence in the preceding paragraph, last sentence in Appendix 1.

TABLE 17. TRAVEL AND TOURISM TECHNICAL REPORT COMMENTS

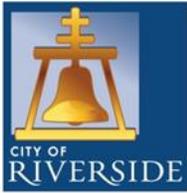
#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1.	General Comment	All pages	Technical Report should consider highlighting/emphasizing opportunities for travel for bicycle/e-bicycle throughout (e.g. the need for bikeways, bicycle use to and from transportation stops/hubs and tourist destinations, the existing bicycle network).
2.	General Comment	All pages	Add "2024" to all technical report page headers' titles
3.	General Comment	All pages	In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data
4.	General Comment	All pages	Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.
5.	General Comment	All pages	If definitions come from specific source or statute, include the reference in the narrative.
6.	General Comment	All pages	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7.	General Comment	N/A	Explain how the Mileage-Based User Fees and Local Road Charge program were included as reasonable funding sources (upon which we rely on for over \$100 billion in funding) when implementation of these funds is based on congress approval and local agencies approval. This could be a major challenge and render both programs reasonably unforeseeable.
8.	Correction	p. 1, Section 1	To address the CFR directive for the “continuous, cooperative, and comprehensive...”
9.	General Comment	p. 1, Section 2	Expand the description for Lake Arrowhead like on Page 7.
10.	Correction	p. 2, Section 2.2	Contradicting sentences: “Moreover, due to the size of the region and variety of places to visit and things to do, much of the traveler spending is generated by people living within the region.” (1 st paragraph) “According to the Visit California 2021 Report, The Economic Impact of Travel, travel spending in the SCAG region totaled approximately \$46 billion, of which about \$41 billion was from people visiting from outside the region.” (2 nd paragraph) Reword to clarify statements.
11.	Correction	p. 3, Section 2.3	“From 2019 to 2020, after the onset of the COVID-19 Pandemic , travel spending in the region went down by 50 percent.”
12.	Correction	p. 8, Section 3.1.2	The title for the section includes Old Town Tustin but there is no example of Old Town Tustin in the list.
13.	Correction	p. 10, Section 3.1.3	Three Eight of the 23 Cal State University campuses are in the SCAG region, Cal State Los Angeles, Cal State Long Beach, <u>Cal State Fullerton</u> , <u>Cal State Northridge</u> , <u>Cal State Dominguez Hills</u> , <u>Cal State Channel Islands</u> , <u>Cal State San Bernardino</u> , and Cal Poly Pomona. Why aren’t private universities included, such as Chapman, Pepperdine, University of La Verne, and Loyola Marymount?
14.	Correction	p. 10	3.1.4 Theme Parks and Movie Studies should probably read <u>Movie Studios</u>
15.	Correction	p. 12; Bullet point #2 Bullet point #3 Bullet point #4 Bullet point #6	“National Football League” should be The Rose Bowl has hosted the National Football League (NFL) Super Bowl five times,...over the years.” “The Coliseum has served as the home for the National Football League’s (NFL) NFL’s Rams and Raiders and is the current homefield home field for the USC Trojans.” “It is home of MLS Los Angeles FC and the National Women’s Soccer League’s (NWSL) Angel City FC.” “Opened in 1993 and formerly known as The Pond, the Honda Center is a an <u>multi-purpose</u> indoor arena located in Anaheim, CA.”
16.	Clarification	P.13	Explain how the region goes from a pilot program of only 5,000 participants to a State-wide program on which we would rely on \$92.2 billion in revenue?
17.	Correction	P.14	Include Irvine Spectrum.

2024-2050 RTP/SCS/PEIR/Related Appendices Comment Matrix

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
18.	Correction	p. 19	"...there a various programs and projects..." should read "...there are various programs and projects..."
19.	Correction	p. 23, Section 4.3	On the second paragraph it looks like there was supposed to be an image added, but it only shows 
20.	Correction	p. 24	3 rd bullet point, should "For the 2024 Coachella Music Festival..." read "For the 2023 Coachella Music Festival..."?
21.	Correction	p. 25; Bullet point #1; first sentence	"The 2028 Summer Olympics...Metro and Caltrans, has developed a LA 28 Games transportation plan."
22.	General Comment	p. 26, Section 5.1	The fourth sentence is almost a repeat of the first sentence. Please delete or reword.
23.	Correction	p. 27	Change "city and county boarders" to "city and county borders "
24.	Correction	p. 29	Last paragraph, correct to read as "California Coastal Commission"



Community Development
Department
Planning Division

City of Arts & Innovation

January 12, 2024

Karen Calderon
Senior Regional Planner
Southern California Association of Governments
900 Wilshire Blvd. Ste 1700
Los Angeles, CA 90017

Subject: City of Riverside's Review of the Draft Program Environmental Impact Report (PEIR)
for SCAG Connect SoCal 2024 Regional Transportation Plan

Dear Ms. Calderon:

Thank you for the opportunity to comment on the Draft PEIR for the Connect SoCal 2024 Regional Transportation Plan (RTP/SCS) Project.

The City of Riverside (City) understands that RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic and environmental goals. The City also understands that the plan details how the region will address its transportation and land use challenges and leverage opportunities in order to support attainment of emissions reduction targets.

LOC
5-1

The City has reviewed the project scope, and we wish to provide the following comments:

Community & Economic Development Department – Planning Division:

- **Chapter 3.11 – Land Use and Planning**
 - **Page 3.11-28 (Mitigation Measures)**
 - SMM-LU-1:
 - SCAG identifies the continued coordination of information sharing to mitigate the impacts of new facilities in residential areas, but this does not clearly articulate how the information sharing will help to mitigate impacts. The mitigation measure should clarify the method of communication and should describe the frequency at which agency coordination is to occur.
- **Chapter 3.14 – Population and Housing**
 - **Page 3.14-21 (Impact POP-1)**
 - The Draft EIR alternately references October 2024 and October 2025 as the deadline for jurisdictions to complete rezoning required to meet the 6th Cycle RHNA. This should be corrected for the sake of clarity.
 - **Page 3.14-23 (Mitigation Measures)**
 - SMM-POP-1:

LOC
5-2

LOC
5-3

LOC
5-4

PDA's and TPA's among other, similarly situated areas of the Region. The Alternatives discussion should be expanded to address this condition.

LOC
5-9
(cont.)

Riverside Public Utilities - Sustainability & Energy Solutions

- **Chapter 3.6 – Energy & Chapter 3.8 – Greenhouse Gas Emissions**
 - **Page: 3.6-14 (Local Policies) & Page: 3.8 - 50 (City of Riverside Green Action Plan)**
 - The Riverside Green Action Plan is an outdated plan which was replaced by the [Riverside Restorative Growthprint](#) created in 2016. The section should be revised to address this newer plan. The City is also currently working on a new Climate Action and Adaptation Plan.

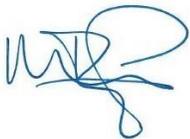
LOC
5-10

The City appreciates your consideration of the comments provided in this letter. Should you have any questions regarding this letter, please contact me at (951) 826-5944, or by e-mail at mtaylor@riversideca.gov.

LOC
5-11

We thank you again for the opportunity to provide comments and look forward to working with you in the future.

Sincerely,



Matthew Taylor
Principal Planner

- cc: Patricia Lock Dawson, Mayor
 Riverside City Council Members
 Mike Futrell, City Manager
 Rafael Guzman, Assistant City Manager
 Jennifer A. Lilley, Community and Economic Development Director
 Maribeth Tinio, City Planner
 Todd Corbin, Public Utilities General Manager

From: Werner Abrego <wabrego@cityofwhittier.org>
Sent: Friday, January 12, 2024 4:22 PM
To: 2024 PEIR
Subject: Comments for Draft PEIR from the City of Whittier

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Report Suspicious

Hello,

Please see the below comments from the City of Whittier concerning the Draft PEIR for the SCAG Connect SoCal 2024 document.

- The document may not reflect the updated General Plan land uses for the City of Whittier. The General Plan was updated in October 2021. This would have the most up to date land use information and forecasts for growth.
- The City of Whittier is expected to be the final stop for Los Angeles Metro Light Rail L Line expansion. The light rail project is planned to be completed in phases and has encountered funding delays. It is likely that the City of Whittier will not see the light rail line reach its city limits until a date uncertain. This will affect Whittier's ability to build out any transit oriented development until the construction of the light rail station becomes more of a reality. Please consider this delay in any forecast for growth or transit oriented development.
- The area of Whittier at the intersection of Washinton Boulevard and Byron Road is a strong job center and economic area of Whittier that is forecasted in the document to see a greater increase in total households. The city is unlikely to change the zoning in this industrial area and the industrial zone does not allow for residential development. The forecast may be using dated zoning information for the City of Whittier.
- It was difficult to discern the map of Priority Development Areas in the SCAG Connect SoCal 2024, might there be an alternative method of displaying the map, perhaps with zoomed in sections that allow for more precise viewing.

LOC
6-1

Thank you for receiving our comments.

Sincerely,



Werner Abrego | Assistant Planner

Community Development Department | 13230 Penn Street | Whittier, CA 90602

(562) 567-9320 | wabrego@cityofwhittier.org | www.cityofwhittier.org

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Letter ORG 1

Comment ID: 0001700.01

Affiliation: Citizens Coalition for Safe Community, and Sierra Club transportation

Submitter: Dr. Tom Williams

Submission:

You haven't mentioned anything about the programmatic EIR.

When is it due? And from what I understand, it's due at in the same timeframe as our comments. So, I'm looking at that. No problem

ORG 1-1



Center for Demographic Research

Sponsors:

California State
University, Fullerton

County of Orange

Municipal Water
District of
Orange County

Orange County
Council of
Governments

Orange County
Transportation
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Water District

Southern California
Association of
Governments

Transportation
Corridor Agencies

Contributing Partners:

Orange County
Local Agency
Formation
Commission

Orange County
Sanitation District

January 11, 2024

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

update@scag.ca.gov

Uploaded via: <https://scag.ca.gov/connect-social-2024-comment-submission-form>

SUBJECT: DRAFT 2024 RTP/SCS “CONNECT SOCIAL” PLAN & TECHNICAL REPORT COMMENTS

Dear Connect SoCal Team:

The Center for Demographic Research (CDR) at Cal State Fullerton has reviewed the Draft 2024 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS, “Connect SoCal 2024”), its associated technical reports, and the growth forecast dataset. We greatly appreciate the opportunity to do so and for all of the work SCAG staff has done to produce these reports and the work with local agencies during the development process. We also want to extend our thanks for the close coordination between SCAG and CDR on behalf of Orange County jurisdictions—and especially during the Local Data Exchange (LDX) process—to ensure the 2024 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current and recent construction; open space; and general plan densities.

CDR also supports the continued use of the 2024 growth forecast development process that incorporated SCAG’s growth vision and policies into the initial growth forecast provided to local jurisdictions for review.

In past iterations, CDR—along with many other agencies throughout the region—encouraged SCAG to incorporate policies and growth visioning into the initial draft growth forecast and to provide that information to jurisdictions to review and revise with updated information as part of the local jurisdiction outreach process. We applaud that SCAG’s development process for the 2024 Plan utilized this recommendation and support the continued use of the 2024 growth forecast development process in future iterations. The fact that the Plan is able to meet its prescribed targets with a growth forecast that includes SCAG’s growth visioning and policies along with original data from local jurisdictions is a great success, and we support the continued use of this process in future iterations. Though we understand SCAG only requested jurisdiction input on the growth forecast for housing and employment, we encourage SCAG to coordinate more closely with local agencies on the related population forecast in future iterations.

We would like to express support for the recommendations by the Orange County Council of Governments, the Orange County Transportation Authority, Transportation Corridor Agencies, and other Orange County agencies whose comments support Connect SoCal 2024 with its use of the Orange County’s growth forecast, the 2022 Orange County Projections, provided during the LDX. We ask for your consideration and response to the following comments:

1. Support the continued use of the growth forecast information provided by local jurisdictions in future Plan iterations so that all development agreements; entitlements; current construction and recent construction; open space; and general plan densities are accurately reflected.

2. Continue to use the 2024 LDX process in future Plan iterations whereby the growth visioning and policies are incorporated into the initial draft growth forecast that is provided to local jurisdictions for review at the beginning of the jurisdictional outreach and feedback (LDX) process.
3. Oppose the selection of any alternatives in the draft PEIR that do not properly reflect entitlements; development agreements; current and recent construction; open space; and general plan densities in Orange County. | ORG 2-1
4. Revise and add the Connect SoCal consistency determination language provided in OCCOG’s comment letter to the main RTP/SCS document, the response to PEIR comments, the Demographics & Growth Forecast Technical Report, and the Land Use & Communities Technical Report. | ORG 2-2
5. Update and add the data usage language’s short-form paragraph provided by OCCOG to any maps or figures that contain or depict the growth forecast data—including TAZ-level maps—or development patterns.
6. Engage the Technical Working Group to assist in updating the style guide to be used in future RTP/SCS efforts to promote and enhance clarity.
7. Support OCCOG’s matrix of comments on the Draft Connect SoCal 2024 (RTP/SCS) plan documents and Technical Reports. | ORG 2-3

Again, we thank you for your time and consideration of the comments above. If you have any questions, please do not hesitate to contact me at ddiep@fullerton.edu or 657-278-4596.

Sincerely,



Deborah S. Diep
Director, Center for Demographic Research

Email CC: CDR Management Oversight Committee
CDR Technical Advisory Committee
OCCOG TAC Ad hoc review committee
Kome Ajise, SCAG
Sarah Jepsen, SCAG
Rubaiya Zaman, CDR



Center for Demographic Research

Sponsors:

California State University, Fullerton

County of Orange

Municipal Water District of Orange County

Orange County Council of Governments

Orange County Transportation Authority

Orange County Water District

Southern California Association of Governments

Transportation Corridor Agencies

Contributing Partners:

Orange County Local Agency Formation Commission

Orange County Sanitation District

January 11, 2024

Ms. Karen Calderon
 Southern California Association of Governments
 900 Wilshire Blvd., Ste. 1700
 Los Angeles, CA 90017
ConnectSoCalPEIR@scag.ca.gov / calderon@scag.ca.gov

SUBJECT: DRAFT 2024 RTP/SCS “CONNECT SOCIAL” PEIR COMMENTS

Dear Ms. Calderon:

The Center for Demographic Research has reviewed the Draft 2024 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS, “Connect SoCal 2024”) PEIR. We recognize and appreciate the work SCAG staff has done to produce these reports and its work with local agencies during the development process in addition to the continued cooperation and reception of initial feedback and draft comments discussion.

ORG 3-1

We also want to extend our thanks for the close coordination between SCAG and the Center for Demographic Research (CDR) at California State University, Fullerton on behalf of Orange County jurisdictions to ensure that the 2024 RTP/SCS and PEIR preferred alternative’s growth forecast accurately reflects all entitlements, development agreements, projects recently completed, and projects under construction.

The CDR would like to express support of comments and recommendations on the Draft 2024 RTP/SCS PEIR by the Orange County Council of Governments, the Orange County Transportation Authority, Transportation Corridor Agencies, and other Orange County agencies whose comments support Connect SoCal 2024 with its use of the Orange County’s growth forecast, the 2022 Orange County Projections. We ask for your consideration and response to the following comments:

ORG 3-2

1. Oppose the selection of any alternatives in the draft PEIR that do not properly reflect entitlements; development agreements; current and recent construction; open space; and general plan densities in Orange County.
2. Add the Connect SoCal consistency determination language provided in OCCOG’s comment letter to the response to PEIR comments.
3. Update and add the data usage language’s short-form paragraph provided in OCCOG’s comment letter to any maps or figures that contain or depict the growth forecast data—including TAZ-level maps—or development patterns.
4. Support OCCOG’s matrix of comments on the Draft Connect SoCal 2024 PEIR.

ORG 3-3

ORG 3-4

Thank you again for the opportunity to provide comments. If you have any questions, please do not hesitate to contact me at ddiep@fullerton.edu or 657-278-4596.

Sincerely,

Deborah S. Diep
 Director, Center for Demographic Research

EMAIL CC: CDR Management Oversight Committee
 CDR Technical Advisory Committee
 OCCOG TAC Ad hoc review committee
 Rubaiya Zaman, CDR



Letter ORG 4

December 26, 2023

Submitted via email to: ConnectSoCal@scag.ca.gov and ConnectSoCalPEIR@scag.ca.gov

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

RE: Comments on the 2024 Draft Connect SoCal

Dear Connect SoCal Team:

Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) 2024 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS), collectively called Connect SoCal. Friends of Harbors, Beaches and Parks (FHBP) has been engaged with SCAG for many years—most recently through its Greenprint Technical Advisory Committee and as a Community Partner for Connect SoCal 2024. We are grateful to be involved in the process and to have developed an excellent working relationship with SCAG leadership and staff.

FHBP applauds your dedicated efforts at community engagement in the development of the 2024 Plan. SCAG partnered with 16 community based organizations, and FHBP was thrilled to be chosen as one. Together the community-based organizations hosted 20 pop-up events and collected over 3,600 survey responses. This was integral to developing a plan that reflects the needs and desires of the region, in addition to providing FHBP the opportunity to deepen our organizational relationships.

Below are our comments on SCAG's 2024 Connect SoCal segmented by topic and chapter.

Direct quotes from the plan shown as *italics*.
Our questions and comments are in **bold**.

FHBP has the following general questions:

1. We understand there is a numerical density cut-off in greenfield land consumption; however, the potential for wildlife impacts appear to be considerably worse. **How was it determined that the scenario planning models in Connect SoCal 2024 are superior to the baseline, despite the projected increases in population, housing, and jobs?**
2. The Plan states in Section 1.2 (pg. 12), "*Sixty-seven percent of new households and 55 percent of new jobs between 2019–2050 will be located in Priority Development Areas, either near transit or in walkable communities.*" FHBP is pleased that SCAG recognizes that new development should be focused in areas where existing transit and services are

located—especially because of its tie to emissions reductions. **Please explain how this will be encouraged in SCAG’s numerous jurisdictions. What benchmarks will be followed?**

3. Connect SoCal assumes only 1,891 acres of improved habitat. **How was this figure derived?**

EXECUTIVE SUMMARY

FHBP appreciates the explanation of the vision set for 2050, and we think it reflects the SCAG communities’ goals: healthy; prosperous; accessible; connected. Furthermore, the focus on mobility and connecting our region’s communities is key to other objectives such as sustainability. The Plan states, “*The region’s communities are often fragmented, lacking connectivity, and having unequal access to housing and essential services such as education, healthcare, and employment.*” (pg. 6) Encouraging connectivity among our communities promotes sustainability in that housing, jobs, and open space is more universally accessible by all communities in the SCAG region. **SCAG should encourage increasing connectivity through pilot programs, grants, and programs that remove the barriers and impediments (such as block walls, fencing, and slopes) by creating pedestrian friendly access (such as entrance cut outs, ramps, and staircases) to community amenities.**

On page 10, the Executive Summary outlines that, “*urbanization continues to consume farmlands and open spaces, which contributes to the loss of groundwater supply and habitat areas that play a critical role in strengthening the region’s resilience. SCAG will collaborate with federal, state, and local partners to ensure that the implementation of the Plan helps address existing air quality challenges, preserve natural lands, and reduce GHG emissions.*” (emphasis added with underline). With such a bold statement in Connect SoCal it is surprising to see that a plan that spans the next 26 years only anticipates 1,891 acres of habitat to be improved across six counties. (See Land Use Technical Report, pg. 44) **Why is this number so low, especially when the Plan notes a goal is to be more resource efficient?** (See Connect SoCal, pg. 11) Furthermore, if the population is trending toward decline (See pg. 31), **why aren’t the natural lands preservation numbers higher?**

As noted in the Natural Lands Coalition letter, FHBP is also pleased to see the environment listed as one of the four core goals of the Plan, in addition to community, economy, and mobility. (pg. 11) **We appreciate that these goals are recognized for their interconnectedness and not seen as siloed.**

The Plan notes (pg. 13) that SCAG doesn’t directly implement or construct projects, but instead helps facilitate them. The work done to date by SCAG on the SoCal Greenprint and Regional Advance Mitigation Program (RAMP) is a prime example of how SCAG’s leadership can help facilitate improved regional planning, project implementation, and provide net environmental benefit through the protection of natural resources, while projects and housing are built across the region. **We had hoped to see the next level of planning to carry this theme forward. More specifically, SCAG should incorporate pilot projects, assist with grant funding, and link those projects in need of mitigation with entities that can identify or manage mitigation lands.**

CHAPTER 2: OUR REGION TODAY

FHBP supports SCAG’s commitment to take into account, in the development of policies, the historic limitations in mobility, housing, and accessing essential services due to federal, state, and local policies that have resulted in racial segregation, gentrification, displacement, and systemic underinvestment. **We encourage SCAG in its efforts to directly address the range of economic and social impacts, such as health outcomes, education, employment, housing conditions, rates of incarceration, and life expectancy in this region based on race, income, and location.**

We appreciate SCAG’s intent on “Planning for Justice.” (pg. 27) These steps are much improved over past plans. However, we are surprised there is no substantive mention of the loss of land, language, culture, and life of California Native American Tribes who were in Southern California since time immemorial. **The Plan lacks substantive goals and policies related to working and collaborating with tribes and even how/if tribal consultation is occurring during this planning process.**

Under the “Step Toward Fairness” section, (pg. 28) it relays three ways disparities have occurred: health, wealth, and opportunities. **We encourage SCAG to also consider “access” as an institutional and systemic barrier.**

SECTION 2.2 NEW AND EVOLVING TRENDS

Rethinking the Workplace

On page 32, SCAG is assuming roughly 22–25 percent of workdays will be conducted at home through 2050. This has enormous impacts on all matters related to land use, especially transportation, the building of new commercial space, and related impacts to open space. **How is SCAG accounting for the one quarter reduction in traditional means of working in its policies? What does this mean for mobility needs and access to technology?**

Climate Change

FHBP supports SCAG’s identification of areas that should not be developed. Specifically, the language that states Connect SoCal will de-prioritize growth on lands that are vulnerable to wildfire, flooding, and sea level rise. Building in locations with these significant vulnerabilities ignores public safety, the human and financial costs of disasters, and the realities that face our region. While more will be covered in a supplemental letter, residents are already facing policy premium increases or lack of coverage altogether by the insurance industry in wildfire prone areas in California. This carries enormous risk both for residents and home builders.

It is surprising to not see access to parks identified as a detrimental effect related to climate change in the Plan. (See pg. 35) Parks are known to reduce urban heat islands, capture and filter water, and improve health—among many other benefits. (Reference the Natural Lands Coalition letter for reports/studies).

Resilience

According to the Plan on page 36, “*Resilience is defined as the capacity of the SCAG region’s built, social, economic, and natural systems to anticipate and effectively respond to changing*

conditions, acute shocks and chronic stressors by creating multiple opportunities for a sustainable, thriving and equitable future.” FHBP would like SCAG to consider examining resilience to the built environment. Sea level rise is an existing stressor that isn’t subsiding. SCAG should include policies, mitigation measures, and performance measures to examine the vulnerabilities and provide policies that ensure our built systems such as transportation and utilities can withstand the challenges posed by sea level rise.

ORG 4-1

It is important to note that SCAG and local/regional jurisdictions can plan for many of the shocks and stressors identified in the Plan. (pg. 36) **While the document identified shocks and stressors, it didn’t account for the need to plan for them either through assessments, SWOT analyses, or other methods like climate action plans.**

While we agree that *“Natural systems can adjust and continue to provide essential resources, including clean air and groundwater, and maintain functioning ecosystems,”* (pg. 36), there is a limit to the system’s ability to function. If the cogs in the natural system aren’t functioning correctly, other cogs disappear, spin out of control, are lost, etc. **The system has a finite capacity to adapt and this should be acknowledged.**

On page 46, the Plan states, *“Overall, the core transportation funding sources that our region has traditionally depended on are declining, volatile, and uncertain.”* The Plan doesn’t seem to acknowledge that more people are working from home. Less driving, equals less gas-tax funding, equals less road impacts, and fewer greenhouse gas (GHG) emissions. [The Hill recently reported](#) in July 2023 that the Federal Highway Administration notes fewer teens are driving and many are delaying getting their driver’s license. **New planning and adaptive policies must occur that take these changes into account.**

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

SECTION 2.3 REGIONAL CHALLENGES

Key Community Challenges

On page 55, SCAG outlines challenges the community is facing such as housing affordability, homelessness, out-migration, and slow growing sustainability. Regarding out-migration, like the increasing trend of working from home, **SCAG must take into account the growing trend of out-migration from the State and region, especially as it relates to housing needs, transportation to supporting housing and the workforce, and the impacts to the environment.**

ORG 4-2

Also on page 55, SCAG says that, *“Regionwide, most of the housing and built environment that we will have in 2050 exists today. Turning the tide on long-standing land use patterns and transportation investments can take a long time, where implementation follows years of planning. This means that even though newer development is trending to be more sustainable than in the past, the pace of progress may be slower than needed.”* This highlights the need for SCAG to encourage retrofitting existing homes to be more sustainable, maintain open space and

farmlands for future generations, and invest in the maintenance of existing transportation infrastructure. Furthering this point, on page 57, the Plan identifies that 40,000 acres of farmland and 50,000 acres of natural lands were lost in the last decade. This must be addressed, and **if what we see now is what will support our region in 2050, we must ensure its sustainability by focusing on investing in on-going infrastructure maintenance, supporting 15-Minute Communities, and focusing on retrofitting existing structures including incomplete housing units.** More will be covered in a supplemental letter on this topic.

SCAG outlines, *“Collaboration and policy leadership: Coordinating policies across jurisdictions is crucial to successful Plan implementation. SCAG will collaborate with local governments, transit agencies, and other stakeholders to align land use and transportation planning, streamline regulations, and encourage cooperation.”* (pg. 62) We are surprised after such a robust effort to include the public and non-profit community in the creation of Connect SoCal, that the community-based organizations and non-profit sectors are not specifically mentioned here—especially as it relates to expertise and land management for RAMP implementation. **We suggest—at a minimum—including non-profit organizations in this partnership list.**

Key Economic Challenges

On page 62, the key economic challenges in the SCAG region are identified as lack of economic opportunities, aging population, and increasing supply chain complexities. **FHBP supports SCAG in its efforts to support residents to participate in the emerging green technology field.** Regarding our aging population, this further highlights the need for more accessible communities in existing urban areas and as many studies show that as people age, they move to smaller homes with more pedestrian access and easy access to services.

SECTION 3: THE PLAN

SECTION 3.1 PURPOSE AND PLAN STRUCTURE

On page 77, the key elements of the Plan are outlined. Regarding the Forecasted Regional Development Pattern, we encourage SCAG to take into account the post-pandemic trends in working and out-migration when forecasting where future jobs and housing are located. **What expert projections and existing planning documents will be used?**

Again, it is surprising to see such low numbers (1,891 improved habitat acres) with such aspirational statements such as (pg. 79) *“Resilience and Conservation: Advance the direction set forth in the SCAG Regional Council Resolution on Climate Change Action and Water Action. Consider opportunities for enhanced resilience and resource conservation—and develop recommendations on how Connect SoCal can support our communities in adapting to changing conditions or mitigating risks to become more resilient.”* This is especially puzzling in light of the acknowledgement that *“SCAG is projecting just over half the level of population growth over this Plan’s horizon as was anticipated in Connect SoCal 2020.”* (pg. 80) **We believe the number of acres being improved must be re-evaluated and increased considerably.**

On page 81, Table 3.1 compares past growth with predicted future growth. It’s noted that total population growth in the past, 1990-2019, is lower in all counties for the upcoming years of 2019-2050. **How was this comprehensive reduction in growth accounted for in the 2024 Plan?**

There is also a missed opportunity on page 85 to retrofit older neighborhoods that help reduce climate impacts. This could include HVAC systems, double or triple pane windows, cool roofs, clean energy systems, water recapture, etc. **These upgrades are completely ignored in the Plan and should be incorporated, especially given that green (and sustainable) building is a stated policy of the Plan.**

SECTION 3.2: THE HEART OF THE PLAN

Fix-It-First Policy

Outlined on page 91 of the Plan, “*Fix-it-First*” has been a guiding principle for prioritizing transportation funding in SCAG’s RTPs for the last decade. *The cost of rebuilding roadways is 14 times greater than preventative maintenance.* **FHBP supports this guiding principle for prioritizing transportation funding in SCAG’s RTP because, as identified in the Plan, the cost of rebuilding roadways is vastly greater than preventative maintenance.** The Fix-It-First policy should include planning for the inevitable cost and community impacts to those transportation assets that will be most impacted by sea level rise or damaged/destroyed by other climate disasters like wildfire or flooding.

Priority Development Areas (PDAs)

On page 100, the Plan identifies that PDAs account for 8.4% of the region’s total land area, and implementation of SCAG’s recommended growth strategies will help these areas accommodate 67% of forecasted household growth and 55% of forecasted employment growth between 2019 and 2050. **Given the reduction in population and the increase of working from home, why can’t these household and employment growth numbers increase?** Of the 55% of employment growth, it can be assumed that 25% of it will be work that occurs from home rather than a commercial or office structure. **Can’t PDAs focus more square footage on high density housing growth, which also tangentially accommodates job growth?** Examples already exist throughout the SCAG region and beyond for adaptive re-use of commercial buildings that accommodate housing in-situ. (See [Santa Monica’s Housing Element](#) and the [City of LA’s Adaptive Re-Use Program](#).)

During the public engagement process in which FHBP served as a Community Partner, we heard from scores of people across the region who consistently identified their top concerns as: open space and recreation opportunities in their neighborhoods; limited reliable travel options other than driving; and climate change impacts. **Increasing the percentage of overall growth in PDAs is critical in addressing the concerns of residents.**

Also, because, as the Plan states, “*the core transportation funding sources that our region has traditionally depended on are declining, volatile, and uncertain,*” (pg. 46) it makes sense to focus development around existing public transportation infrastructure to ensure its usage and therefore help its sustainability and maintenance. **Are there incentives or fees that can be included in a mitigation measure to encourage jurisdictions to ensure development occurs in PDAs thereby advancing land preservation goals and Fix-it-First transportation policies?**

ORG 4-3

If, as the Plan states, “*only 7% of the region’s future household growth will be located in SOIs [Spheres of Influence] outside of incorporated city boundaries from 2019 to 2050,*” (pg. 101)

then why are only 1,891 acres being permanently protected as a result of this Plan as identified in the Land Use and Communities Appendix?

We support focusing housing in the PDA and avoiding or severely limiting greenfield development.

Green Region / Resource Areas (GRRAs)

FHBP enthusiastically supports SCAG’s commitment to steer development away from GRRAs as highlighted both on page 103 and in the Land Use and Communities Technical Report, page 55, which shows a decrease in housing in GRRAs from 72.82% (2019) to 72.60% in 2050. As noted, these areas contain the most acute risks from climate change, would have the most environmental impacts, and cost the most in mitigation to develop due to the rich biodiversity and sensitive habitat types.

On page 103, coastal inundation is highlighted as one of 10 topic areas of GRRAs. The Plan doesn’t fully address the impacts to infrastructure (transportation, utilities, broadband, cell towers, gas and sewer lines, etc.) from sea level rise. **We note that, moving forward, SCAG will discourage new development within these flood zones, yet costs and community impacts from sea level rise to existing infrastructure must be addressed in the 2024 Plan. If the costs and community impacts are clearly defined by SCAG, it will further the goal of discouraging developers to pursue building in these zones.**

The Plan identifies Natural Community Conservation Plans and Habitat Conservation Plans (NCCP/HCP) as tools to allow economic activity. These Plans, in several instances (Orange County and Riverside County) are also directly tied to transportation. **This should be acknowledged in the Plan on page 104.** Further, the document outlines “appropriate economic activity” related to NCCP/HCP. **How is “appropriate” defined? Regional Conservation Investment Strategies (RCIS) were excluded from the Plan and we believe—since those offer another voluntary method to construct housing, transportation, and protect the environment—RCIS should be included.** (See [San Bernardino RCIS](#).)

Again Natural Lands are touted as a way to reduce climate impacts and GHG emissions (pg. 106), but with only 1,891 acres projected for improvement during the next 26 years, **this projection doesn’t match the stated policy objective.**

Regional Strategic Investments

Natural and Agricultural Lands Preservation

In Chapter 3, page 109, a footnote states that the Regional Advance Mitigation Programs or RAMP was “*previously a mitigation measure in the Connect SoCal 2020 PEIR (SMM BIO-2). In this cycle, the RAMP has been elevated to a plan feature, which reduces impacts.*” **What is a “plan feature?” It isn’t defined in the document. Does this mean that there will be implementation of the RAMP? Will SCAG create pilot programs and best practices for RAMP? We hope so and believe this next step will help streamline projects, permitting, and environmental protections.**

ORG 4-4

While FHBP mainly focuses its work in Orange County, we have been able to relay our experiences with the successful RAMP under the Orange County Transportation Authority's (OCTA) Renewed Measure M (M2) to other county transportation agencies in California. Measure M2's Environmental Mitigation Program has permanently protected 1,300 acres and restored nearly 350 acres throughout Orange County. This innovative program enables 13 freeway projects to collectively mitigate impacts with large landscape-level mitigation, instead of small individual project-by-project mitigation efforts. It streamlines the environmental review and permitting process, allows projects to come in under budget, builds a positive working relationship with resource and permitting agencies (as well as conservation-focused non-profits), allows more thoughtful science-based conservation planning to occur, and is supported by many conservation and community organizations. **The tremendous success of this Orange County program, in just one SCAG county, should inform SCAG to estimate much more than 1,891 acres to be improved under Connect SoCal for six counties. The SCAG habitat improvement numbers should be revisited.**

SECTION 3.3: REGIONAL PLANNING POLICIES

Mobility

Policy 01 and 02 outlined on page 114 focus on SCAG's Fix-It-First objectives and transportation investments. Existing transportation assets that will be impacted by sea level rise should be included in these policy considerations.

Communities

Policies 32-34 on page 116 aim to promote new development where there is existing infrastructure. **This policy is standard and must include some real implementation measures that include carrots *and* sticks.**

The very areas with high homelessness are the same areas with high percentages of substandard housing. **Please connect the intent of Policy 41 on page 117 with the existence of substandard housing.** The Housing Technical Report on page 10 identifies 80,909 units lacking kitchen facilities and 22,822 units lacking complete plumbing. This provides an enormous opportunity to meet housing demands and elevate these tenants' dignity, health, and wellbeing. **Can SCAG implement and promote policies that bring incomplete facilities and substandard housing to livable standards, thereby providing additional housing without the need for additional new infrastructure or added GRRRA development?**

Policy 43 on page 117 says SCAG will support 15-Minute Communities that improve "*quality of life, public health, mobility, sustainability, resilience, and economic vitality.*" **FHBP recommends, as part of the policies related to 15-Minute Communities, that parks and recreational opportunities be included in the concept because neighborhood parks meet all the objectives listed as part of Policy 43.** Furthermore, neighborhood park capacity, specifically a lack of capacity throughout the region, was identified during SCAG's public outreach effort. While large swaths of open space are ideal for carbon sequestration, vehicle-accessed recreation, and habitat management, neighborhood parks are critical for public health. This is especially true in areas of very low and low incomes residents. Residents with lower incomes may not have vehicles or choose to not have vehicles due to any number of factors. This reduces their ability to

travel to further away open space areas, making local parks more important. Further, there are ways to reprogram local streets (See [CicLAvia](#) and [FHBP's Urban Park Study](#).)

15-Minute Communities must include policies encouraging the establishment of urban growth boundaries around these areas, which would assist in the goals of Connect SoCal 2024. A local example, but with a slightly different approach that SCAG often references, is Ventura's Save Open Space and Agricultural Resources (SOAR) initiative. In addition, in communities such as Marina, California, which is a coastal middle-class city and has many similarities to SCAG's region, an urban growth boundary forces development inside the boundary. That city has shown incredible progress in higher-density housing, transit usage, pedestrian and bike access, and increased sales tax revenues. (See [Marina's Urban Growth Boundary](#) measure, which was first approved in 2000 and later re-approved by voters in 2022).

Environment

On page 118, Policy 48 states, "*Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption, and promote resilience.*" **This policy is unclear. Is SCAG referring to Low Impact Development (LID), Leadership in Energy and Environmental Design (LEED) standards or something else? FHBP urges more specificity to be clear on what best practices are being recommended.**

Policy 49 (pg. 118) iterates the implementation of the Forecasted Regional Development Patterns of Connect SoCal 2024. **Please explain if household, employment, and population projections, reviewed and refined by jurisdictions, account for the slower population growth projected and the work-from-home scenarios.**

On page 118, Policy 50 directs supporting communities to use sustainable development practices. **Does the Plan indicate the ideal practices to be supported? What practices can jurisdictions look to as examples?**

Policy 56 on page 118 says, "*Promote equitable use of and access to clean transportation technologies so that all may benefit from them.*" **Please explain. How will the SCAG Plan improve equitable use and access?**

On page 119, Policy 59 correctly identifies that the economic benefits of natural and agricultural lands must be prioritized. SCAG continues to overlook the incredible economic benefits of open space and recreation. SCAG can examine any area in California and beyond where a National Park or a National Monument or local open space area was opened to the public, and see the immediate increase in sales tax revenue in the stores, markets, restaurants, and EV-charging and gas stations, within a few mile radius of the park. **This specific economic impact of recreation must be considered in the Plan. Additionally, please take into account the economic assets related to viewsheds that contain these types of properties.** (See [The Trust for Public Land's Economic Benefits of Parks Report](#), the [Lincoln Institute's Economic Value of Open Space report](#), and the [Institute for Local Government's Economic Benefits of Open Space, Recreation Facilities, and Walkable Community Design Report](#).)

Policy 62 on page 119 says to “*encourage the protection and restoration of wildlife corridors.*” Animal corridors are a strong indicator of habitat health and regional environmental health. **Given that, it’s unclear what implementation measures will encourage the development and protection of animal corridors. Please explain how animal corridors will be encouraged and implemented, and how success is measured by SCAG.** Further, it is unclear from this language what animal classifications are included in the term “wildlife corridors.” **SCAG should be clear that this includes the entire suite of species from amphibians to reptiles and birds to mammals—everything that utilizes movement corridors (air, land, water, etc.) is covered under this policy.**

Section 3.4: Plan Fulfillment

Strategies

System Preservation and Resilience

On page 124, “*Collaborate to work toward a regional asset management approach.*” **SCAG is the partner on this effort, and given the critical nature of asset management, we’d like further details regarding the strategies and benchmarks of the partnerships.**

Complete Streets

On page 124, “*Develop a Complete Streets network and integrate Complete Streets into regional policies and plans, including consideration of their impacts on equity areas.*” **SCAG is the lead on this strategy. What’s the timeline for creating the network and the method for ensuring the integration into individual jurisdictions’ policy documents?**

Transportation Systems Management

On page 126, “*Evaluate projects submitted for inclusion in RTP/SCS and Federal Transportation Improvement Program (FTIP) for progress in achieving travel-time reliability in the SCAG region.*” **What is meant by “progress?” Will SCAG review past projects for efficiency in tandem with new projects’ reviews?**

Funding the System / User Pricing

On page 128, it states SCAG will lead “*Study and pilot transportation user-fee programs and mitigation measures that increase equitable mobility.*” **Where will SCAG host the pilot programs and will there be a variety of locations? What are the objectives and desired outcomes of the study? How will equity be centered in this policy so that no new burdens are placed on very low and low income residents?**

Priority Development Areas

On page 129, SCAG is listed as a partner to “*Develop housing in areas with existing and planned infrastructure and availability of multimodal options, and where a critical mass of activity can promote location efficiency.*” **How does this strategy relate to supporting and developing 15-Minute Communities?**

15-Minute Communities

On page 129, SCAG is listed as the lead to “*Develop technical-assistance resources and research that support 15-Minute Communities across the SCAG region by deploying strategies that include, but are not limited to, redeveloping underutilized properties and increasing access*”

to neighborhood amenities, open space and urban greening, job centers, and multimodal mobility options.” **How will this strategy be implemented and what technical-assistance resources will be provided? Does this policy link somehow to the Greenprint? How can this relate to fixing existing substandard housing totaling over 100,000 units, as identified in the Housing Technical Report?**

On page 129, SCAG is to act as a partner to “*Identify and pursue funding programs and partnerships for local jurisdictions across the region to realize 15-Minute Communities.*” **What will the parameters be when identifying funding and program development?**

Sustainable Development

On page 131, SCAG is listed as the lead to “*Monitor and pursue funding opportunities that can foster sustainable and equitable land use and development across the SCAG region. Explore the feasibility of creating a pilot grant program to support local planning and/or implementation.*” **We hope that existing research and implementation measures in other jurisdictions are used as examples so SCAG isn’t reinventing the wheel. Also, what sustainable development practices is SCAG focused on?**

Section 5.1 Performance Outcomes

Performance Monitoring

On page 176, the Plan explains that projects’ performance regarding the regional goals established by Connect SoCal are monitored using the FTIP. While measuring projects’ performance against Connect SoCal’s Plan objectives after projects are built is critical for future planning, **what does the ongoing monitoring look like and how is this reported to the public?**

Plan Performance

Given that the baseline is 2019, how are new conditions post-pandemic considered, such as working from home and fewer vehicle miles traveled, in the performance profile starting on page 178?

Table 5.1, Performance Measures, outlines baseline conditions, conditions with Connect SoCal, and the trend. On page 181, the table lists: “Park Accessibility” with two performance measures:

1. “*Share of population able to reach a park within 30 minutes by auto*”
2. “*Share of population able to reach a park within 30 minutes by transit?*”

This vehicle-centric focus is antithetical to the concept of a 15-Minute Community because it urges people to continue to use greenhouse gas intensive methods to access parks. SCAG should focus on a 15-Minute walk or ride to a park, meaning **SCAG must develop policies encouraging neighborhood parks.** The Trust for Public Land has a tool that calculates a community’s “[ParkScore](#),” which provides on-the-ground information about park equity for communities and includes the greater SCAG region. **These performance measures should be redrafted to focus on pedestrian-oriented access to parks.**

Section 5.2: Regional Benefits

In Table 5.2 there are numerous performance measures related to mobility, especially vehicle-related mobility. **Does the trend take into account new post-pandemic trends for “Person Hours of Delay by Facility Type?”** The reductions are averaging 22% and it’s unclear if these impressive reductions are from projects and maintenance alone. **How will this performance be measured?**

Page 178, and again on page 181 and 184, identifies Rural Land Consumption (also called Greenfield) as being reduced 48% from the baseline. **If 37 square miles won’t be developed—again why only 1,891 acres of improved habitat? We don’t feel the connections are being made between the policy performance and the on-the-ground situation.**

On page 184, Table 5.2 identifies a savings of 7.5% or \$2.8 billion when comparing the 2050 baseline with Connect SoCal relative to local infrastructure and services costs. **Does this figure account for infrastructure costs associated with impacts due to sea level rise?**

The same table on page 184 identifies a paltry savings of 0.4% when comparing building water use between the 2050 baseline and the Connect SoCal Plan. **Please explain why the Connect SoCal Plan’s policies aren’t realizing larger water savings for residential and commercial buildings. Are there additional policies and mitigation measures that can be included?**

ORG 4-6

On page 193, the performance measure for Neighborhood Change and Displacement doesn’t purport to analyze the impact from infrastructure improvements and gentrification. SCAG already identified on page 19 of the Housing Technical Report that, *“Displacement pressures can be further exacerbated by major public investments, such as improved infrastructure and amenities. However, in some instances, these major infrastructure investments may come first, and gentrification follows.”* **Please include a performance measure and summary of analysis to study infrastructure investments’ impacts on gentrification pressures.**

FHBP will be submitting comments by document. Sometimes there is overlap with the Program Environmental Impact Report and Environmental Impact Statement, so both email addresses are included when submitting. This letter serves as the first of several on the Plan, its appendices, and environmental documents. Thank you for the opportunity to comment on Connect SoCal.

Sincerely,



Michael Wellborn
President



January 11, 2024

Submitted via email to: ConnectSoCal@scag.ca.gov and ConnectSoCalPEIR@scag.ca.gov

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

RE: Comments on the 2024 Draft Connect SoCal Programmatic Environmental Impact Report

Dear Connect SoCal Team:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2024 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) called Connect SoCal's Programmatic Environmental Impact Report (PEIR). This comment letter follows Friends of Harbors, Beaches and Parks' (FHBP) comment letters on the Plan submitted previously on December 26, 2023, the Land Use and Communities Technical Report submitted on January 3, 2024, and the Housing Technical Report submitted on January 7, 2024.

ORG 5-1

Below are our comments on SCAG's 2024 Connect SoCal PEIR segmented by chapter.

Direct quotes from the plan shown as *italics*.
Our questions and comments are in **bold**.

Executive Summary

On page ES-7, the document states:

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

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

ORG 5-2

How does SCAG portend to achieve its “Environment” pillar when, as documented in the Land Use and Communities Technical Report, SCAG anticipates losing 48,000+ and 8,100+ acres of natural and farmlands, respectively, by 2050? This means the PEIR's project

description doesn't align with the outcomes. And, the impacts are significant and unavoidable, but we believe could be reduced or minimized further.

ORG 5-2
(cont.)

In the Executive Summary, page ES-15,

“The CEQA Guidelines require an EIR to present issues to be resolved by the lead agency. These issues include the choice between alternatives and whether or how to mitigate potentially significant impacts. The major issues to be resolved by SCAG, as the lead agency for the project include the following:

- *Whether the recommended mitigation measures should be adopted or modified;*
- *Whether additional mitigation measures need to be applied to the project; and*
- *Whether the project or an alternative should be approved”*

Below are our comments on proposed additional mitigation measures that we recommend need to be applied to the project to reduce, minimize, or avoid impacts.

(SMM = SCAG Mitigation Measure, PMM = Project Mitigation Measure)

1. Aesthetics

SMM-GEN-1 states: “SCAG shall continue to facilitate interagency cooperation, information sharing, and regional program development, such as through existing planning tools to support local jurisdictions including various applications offered through the SCAG Regional Data Platform (RDP), SoCal Atlas, HELPR, and other GIS resources and data services. For more information or assistance, please contact SCAG’s Local Information Services Team (LIST) at list@scag.ca.gov.”

ORG 5-3

In addition to the SCAG Regional Data Platform (RDP), SoCal Atlas, and HELPR, this list should include the SoCal Greenprint as a planning tool that supports local jurisdictions and county transportation commissions (CTC).

PMM-AES-1 This list should context sensitive design as a feature of how to reduce or minimize visual impacts for transportation projects and other infrastructure (i.e., cell towers). This mitigation measure should also include bird strike prevention glass installation to reduce impacts to avifauna. Finally, this mitigation measure should also consider undergrounding utilities in urban areas to reduce visual impacts and bird impacts as well.

ORG 5-4

2. Agriculture

IMPACT AG-4 states: “Potential for the Plan to result in the loss of forest land or conversion of forest land to non-forest use. (emphasis added as underlines) The document indicates we should look to: SCAG Mitigation Measures SMM-AG-1, SMM-AG-2 and PMM-AG-3.

ORG 5-5

Forest lands are NOT agricultural lands. SCAG has done nothing in this mitigation measure to minimize, reduce, or avoid forest land impacts, as required by CEQA. This habitat type is not the same as agricultural land. SCAG must adopt mitigation measures that address forest lands or this becomes a deficiency in the environmental

document. Further, National Monuments and impacts from Connect SoCal (especially viewshed impacts) are not at all addressed in this section making the document deficient.

ORG 5-5
(cont.)

IMPACT AG-5 states: “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 nonagricultural use or conversion of forest land to non-forest use.”

ORG 5-6

Again, none of the proposed mitigation measures address forest lands, only agricultural lands. This must be corrected to make the document legally compliant with CEQA.

3. Biological Resources

IMPACT BIO-4 states: “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.” ...

“PMM-BIO-4(g) When feasible and practicable, minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors in project design.”

ORG 5-7

Wildlife corridor features should be incorporated into the project design phase and not simply identified during the environmental review/mitigation process. This pre-planning can not only help avoid project impacts, but also identify project objectives that retain wildlife movement features and function.

PMM-BIO-4(k) “Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).”

This mitigation measure should not be limited to mitigation banking, but should also include acquisition or preservation of landscapes and habitat types in partnership with agencies, conservancies, joint-powers authorities, and/or land trusts. Few mitigation banks are considered viable and even fewer entities own/manage them in the SCAG region. Fee title acquisition is another opportunity. SCAG and its member agencies and CTCs could partner with Resource Conservation Districts, Park and Recreation Districts, and/or land trusts/non-profits.

ORG 5-8

PMM-BIO-4(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. Provide wildlife crossings in accordance with proven standards, such as FHWA’s Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities.”

ORG 5-9

This should not just be limited to roadway projects, but should rather include all infrastructure projects (like solar, sewer, powerlines, etc.). Further, this mitigation measure should include wildlife corridor functionality and be designed for the widest array of species. This planning should occur during the design phase, instead of retroactively fixing projects after the fact at considerably higher costs.

4. Recreation

IMPACT REC-1 states, “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.”

SMM-Rec-1 should include the SoCal Greenprint as a resource for providing information related access to local and regional parks and identifying park deficient neighborhoods in the SCAG region.

ORG 5-10

Chapter 1: Introduction

The document outlines the various opportunities afforded to the public to provide substantive feedback on the environmental document for Connect SoCal. The PEIR unfortunately completely misses the recording feedback provided during the SCAG Community Partner Program, of which FHBP was a part of. The dozen or so community-based organizations and non-profits collected this information in May 2023 and, at least for FHBP, the feedback went beyond Connect SoCal and highlighted the PEIR as the SoCal Greenprint and Regional Advance Mitigation Programs (RAMP) were discussed numerous times and both are mitigation measures in this PEIR. **We urge inclusion of the Community Partner feedback, where fitting, into the PEIR.**

ORG 5-11

**Chapter 3: Environmental Setting, Impacts, and Mitigation Measures
CEQA BASELINE CONDITIONS FOR ANALYSIS OF IMPACTS**

On page 3-4, the PEIR states, *“By 2050, implementation of the Plan will result in a land use pattern and transportation network that is different from existing conditions. Unless otherwise stated, “existing conditions” in the Plan refers to conditions in the baseline year of 2019. The Plan uses 2019 as a baseline year for analysis, rather than the NOP issuance date (October 2022), because it is consistent with SCAG’s modeling baseline for the Plan and the most recent year for which comprehensive land use, demographic, traffic count, and vehicle miles traveled (VMT) data are available for the Plan area, as described further below. **Given that the baseline is 2019, how are new conditions post-pandemic considered?***

ORG 5-12

Also on page 3-4, the PEIR states, *“The primary basis for reliance upon 2019 data for baseline conditions is related to the drastic changes in travel patterns, transportation activity, employment conditions, and overall movement of goods and people in the region as a result of the COVID-19 global pandemic. With the onset of stay-at-home orders, social distancing mandates, travel restrictions, and other pandemic-related effects in early 2020, historic trends related to commute patterns, vehicular activity, air traffic, public transit, goods movement, and other relevant metrics were drastically skewed by the sudden comprehensive changes in daily life resulting from the government’s response to the virus. Although many pandemic-affected activities have since stabilized and, in some cases, returned to pre-pandemic levels, many key factors such as widespread work-from-home policies, food and retail product delivery services,*

ORG 5-13

and leisure travel demands have not returned to prior conditions and may never do so.” We understand the intent to have a consistent comparison to the 2020 Plan, but given that the baseline is 2019, how are new conditions post-pandemic considered in the PEIR’s evaluation of impacts and mitigation measures? COVID had lasting and potentially permanent impacts on travel patterns, flexible schedules, telecommuting, and 100% remote work options.

ORG 5-13
(cont.)

3.0.5 Cumulative Impacts

The PEIR outlines on page 3-9, *“As discussed in the following sections of the 2024 PEIR, the Plan would result in significant impacts in all issue areas (except for two issue areas: Plan’s consistency with federal transportation conformity requirements under Air Quality and Plan’s consistency with SB 375 under Greenhouse Gas Emissions). While the land use policies and strategies included in the Plan would result in a more compact development pattern which in turn would reduce impacts, the Plan could also facilitate access to other areas of the state by increasing infrastructure which could ultimately influence growth in areas outside the region’s boundaries. Mitigation measures would reduce impacts, but impacts would remain significant and could contribute to cumulative impacts outside the SCAG region.”* **It doesn’t appear that the document creates mitigation measures for the induced growth caused specifically by this increase in infrastructure and subsequent growth outside the region. But, the document does acknowledge:** *“Growth can be induced in a number of ways, including the elimination of obstacles to growth, or by encouraging and/or facilitating other activities that could induce growth.”* (pg. 5-9) **This impact should be addressed as a mitigation measure. How can the Plan result in a more compact development pattern when Connect SoCal indicated we lost 50,000 natural land acres and 40,000 farmland acres to development between 2012 and 2019? We recognize that not all infrastructure creates growth, but installing infrastructure such as powerlines, sewer lines, roads, and the internet increases access and project viability to previously inaccessible areas with unviable projects. This has not been accounted for in the mitigation measures and should be. If infrastructure goes in, every attempt should be made to have it constructed in the existing right of way so that new growth in the Green Region Resource Area (GRRRA) is not growth-inducing impacts.**

ORG 5-14

3.2 Agriculture and Forestry Resources

On page 3.2-2, the document states, *“California ranked first among the 50 states in 2020 in terms of net farm income at \$14.2 billion (California Department of Food and Agriculture 2021). Agricultural and related products are also one of California’s largest exports to the rest of the world. As of 2018, the SCAG region maintains over 2.6 million acres of agricultural land, which includes approximately 1.1 million acres of Farmland and approximately 1.50 million acres of grazing land/rangeland, with over 100,000 parcels of land designated as either Farmland or grazing land/rangeland (DOC 2023a). For purposes of this analysis and in accordance with SB 375, “farmland” means farmland that is outside all existing city spheres of influence or city*

ORG 5-15

limits as of January 1, 2008. We appreciate the PEIR’s highlighting the critical importance of SCAG farmland, but are surprised there aren’t greater protections for it. We’re disappointed that the Connect SoCal Plan projects over 8,156 acres of farmland lost over the life of the Plan (See Land Use and Communities Appendix). This must be improved. Additional mitigation measures must be added to reduce the amount of agricultural land lost to urbanization. One mitigation measure could be to provide policy and toolkit examples of agricultural protection mechanisms like Ventura’s forward-thinkign SOAR (Save Our Agricultural Resources) measure.

ORG 5-15
(cont.)

Because the voter approved SOAR initiative, the PEIR on page 3.2-3 states, “*The conversion of irrigated farmland to urban land is primarily due to urbanization, which increased between 2016 and 2018 for all counties except Ventura.*” **SCAG should consider mitigation measures that promote city and county adoption of initiatives like Ventura’s to reduce farmland loss.**

ORG 5-16

On page 3.2-4, the document reads, “*As shown in Table 3.2-3, SCAG Region Important Farmland Average Annual Acreage Change (1984–2018), the SCAG region lost an average of 9,010 acres of Important Farmland from 1984 to 2018 (DOC 2018).*” **This equals over 300k acres lost to urbanization. How is it that over the life of the plan only 5,707 acres of important farmland are lost (2019-2050) in Table 3.2-4. Doing the math, this means that over the life of the Plan only 184 important farmland acres are lost annually. It is unclear to us how in the previous ~34 year timeframe over 306,000 acres were lost and in the next 30 year segment only 5,707 are lost? We can’t find the connection of slowdown this document indicates—especially in light of the finding that for Agricultural Resources the impacts are significant and unavoidable even with mitigation measures? The trends from this table seem to have completely reversed, which doesn’t align with the known figures from the PEIR and Connect SoCal’s estimate of the loss of 50,000 acres in the last decade (See Connect SoCal, pg. 57). The math doesn’t add up. Please explain.**

ORG 5-17

On page 3.2-6 of the PEIR, “*It is estimated that 3,501 human-caused fires have burned approximately 1,458,881 acres of California in 2020 (CAL FIRE 2020). Refer to Section 3.20, Wildfire, of this 2024 PEIR for a discussion of wildfire impacts. Fire management and protection professionals now face longer fire seasons, bigger fires, and more acres burned on average each year, and more extreme fire behavior as climate change intensifies fire conditions.*” **Studies like those done by our organization and Hills For Everyone focusing on Orange County and neighboring wildland areas indicate roadways are one of the key ignition locations for conflagrations. (See [FHBP’s Wildfire Study 2020](#) and [Hills For Everyone’s Wildfire Study 2019](#)) Our first recommendation is that SCAG add mitigation measures that reduce wildland fire ignitions along roadways via new strategies and better roadway easement management. Our second recommendation is that SCAG include a mitigation measure to work with CalFire, local Fire Safe Councils, and homeowners’ associations to implement**

ORG 5-18

FireWise Communities, implement restoration projects that remove flashy non-native grasses, and improve habitat via restoration projects at the Wildland Urban Interface.

ORG 5-18
(cont.)

On page 3.2-14, the PEIR states that 5,707 acres of Important Farmland will be lost by 2050 under the Connect SoCal 2024 Plan. The 2020 Connect SoCal Plan (See 2020 Natural and Farmlands Appendix, pg. 8) projected a loss of 7,310 acres. **Is the 2024 estimate a reasonable number given on average the number of acres lost is 41,560 annually between 1984-2018, according to Table 3.2-3 on page 3.2-4? The math doesn't add up. Not only does this need explanation, but additional mitigation measures to protect Important Farmland acres should be incorporated.**

ORG 5-19

The PEIR identifies, SMM-AG-2 on page 3.2-15 as *“SCAG shall continue to facilitate regional collaboration forums, such as the Natural & Farm Lands Conservation Working Group, for stakeholders to share best practices and develop recommendations for natural and agricultural land conservation throughout the region. The collaboration forums with help identify opportunities to leverage resources that protect and restore natural habitat corridors, especially, where corridors cross county boundaries.”* **FHBP supports SMM-AG-2's commitment to continuing SCAG's leadership on the Natural and Farm Land Working Group. We support this mitigation measure and hope that these meetings occur regularly, with at least a months' notice as recent meetings have yielded considerably poor attendance.**

ORG 5-20

FHBP also supports SMM-AG-3 on page 3.2-15 because SCAG committed to developing the Regional Greenprint in its 2020 PEIR as SMM-BIO-2 (See 2020 PEIR, pg. 3.4-71). Further, we ask that SCAG incorporate in this SMM-AG-3 mitigation measure at least one substantive update to the Greenprint data and that it occur before the 2028 Plan is drafted.

ORG 5-21

The document on page 3.2-18 indicates PMM-AG-3 as *“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:”* (emphasis added with underline). **This mitigation measure isn't effective and fails to achieve the desired impact reduction. Farmlands aren't actually addressed in the list of mitigation measures and as stated before farmlands aren't forest or timberlands. Please add agricultural easements as option “c” below the forest/timberland easement. Further, there are mitigation measures for forest and timberlands included, but that habitat types isn't even listed in this paragraph. This habitat should be added to the opening paragraph of PMM-AG-3 if the mitigation measures are included for them. Additionally, the mitigation measure continues with (b) having the option to “acquire conservation easements for the loss of forestland or timberland.” How will this occur? Who will hold the easements? What type of non-wasting endowment will be established to maintain said easements?**

ORG 5-22

Page 3.2-19 of the PEIR states, “Despite policies and strategies included in the Plan [that] aim to encourage future development in PDAs [Priority Development Areas], some of the new transportation facilities would be constructed outside of such areas. Additionally, development associated with new urban uses could also be located on forest land, resulting in the conversion of small patches of forest land to non-forest use.” Based on the language on page 3.2-19, the PEIR states, “Transportation projects that are most likely to result in impacts to forest lands include highway expansion, highway widening projects, and potential connectors.” **We agree that there will be impacts to forest lands (among other lands). How can SCAG ensure that development doesn’t follow in places where transportation connectors are built, as referenced on page 3.2-19, especially in light of the protections in place within National Monuments? The following National Monuments exist in the SCAG region: Santa Rosa and San Jacinto Mountains, Sand to Snow, San Gabriel Mountains (and its proposed expansion). Please include mitigation measures that directly address National Monuments’ impacts.**

ORG 5-23

Regarding PMM-AB-4 on page 3.2-21, please define “economically viable farming operations.” And, because new residential communities may be built immediately adjacent to agricultural operations, it is standard practice to require agricultural buffers around any development adjacent to farmland to reduce neighborhood interference and impacts. This should be added as a mitigation measure to reduce further impacts to agricultural operations/land.

ORG 5-24

CHAPTER 3 Environmental Setting, Impacts, and Mitigation Measures

3.4 Biological Resources

The PEIR is using 2023 and 2022 data as referenced in this chapter for its biological resources impacts. Why then doesn’t the Land Use and Communities Technical Report use the most current California Endangered Species Act list and federal Endangered Species Act list as a resource. Instead it references the 2015 State Wildlife Action Plan. (See Connect SoCal, pg. 6) The discrepancy is palpable.

ORG 5-25

Page 3.4-31 of the PEIR states, “Construction activities in or adjacent to natural habitats would also increase the risk and frequency of fires that could degrade the function and value of habitats supporting sensitive species (impacts from wildfires are further discussed in Section 3.20, Wildfire, of this 2024 PEIR). Further, indirect impacts could result from implementation of the Plan 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.” **It is standard practice that development projects immediately adjacent to protected wildlands (i.e., State Parks, etc.) incorporate a distinct buffer, also often**

ORG 5-26

considered a fuel modification zone between the new development and the protected lands. Further, we urge SCAG to incorporate a PMM that promotes not only these Wildland-Urban Interface buffers, but also supports local Fire Authorities and the California Native Plant Society “California Friendly Wildfire Resistant” vegetation plans in developments. The Cielo Vista project in Orange County (Yorba Linda Sphere of Influence) has set the standard by following the Orange County Fire Authority’s Recommended Plant Palette, while at the same time only using Southern California native plants. This reduces the impacts from non-native plant introduction to wildland areas and supports wildfire and public safety components.

ORG 5-26
(cont.)

It remains unclear to us what a “*plan feature*” is and how this is or isn’t considered a mitigation measure, especially since plan features “*may reduce impacts*” (pg. 3-3 and 3-8). Regional Advance Mitigation Programs (RAMP) already adopted in Riverside and Orange Counties have mitigated the impacts of both housing and transportation projects in both counties. It is unclear why then that a Plan Feature “may reduce impacts,” when it is proven to do just that if actually implemented. That’s why FHBP recommends actual implementation of the SCAG RAMP. Talking about mitigating impacts via RAMP doesn’t actually mitigate impacts. RAMP implementation should be a stand alone mitigation measure.

ORG 5-27

The document notes on page 3.4-34 that “*The RAMP enables SCAG to work with implementation agencies to support, establish, or support regional advance mitigation programs for regionally significant transportation projects to help mitigate environmental impacts and reduce per-capita VMT [vehicle miles traveled].*” **We remind SCAG that transportation projects are just one area that could use RAMP. Infrastructure projects like powerlines or water, sewer, or solar facilities, as well as developments can also benefit from RAMP. Since this is a comprehensive plan that covers all land use types, we request SCAG broaden the limited scope of the RAMP. Further, since the RAMP policy framework was adopted in 2023, SCAG should take the next step in the process and actually launch a RAMP. How else will the envisioned \$1B of advance mitigation dollars be spent, as identified in the Project List Technical Report (pg. 429)? RAMP guarantees that impacts will be reduced.**

ORG 5-28

Regarding PMM-BIO-1 outlined on pages 3.4-35-36, **please include assurances that in-lieu fees are used in a timely way in the same geographical area or watershed and for the same species impacted.**

ORG 5-29

Regarding PMM-BIO-3 outlined on pages 3.4-41-42, **please include assurances that in-lieu fees are used in a timely way to protect similar watersheds in the same geographical area of the ones impacted.**

ORG 5-30

Regarding PMM-BIO-5 outlined on pages 3.4-49-50, **please include greater details regarding payment of in-lieu fees such as: timeline of payment; timeline of expenditure; benchmarks of expenditures; who oversees success of expenditures; and who is accountable.**

ORG 5-31

In Connect SoCal, policy 62 on page 119, it says to “*encourage the protection and restoration of wildlife corridors.*” **Wildlife corridors are a strong indicator of habitat health and regional environmental health. Given that, it’s unclear what implementation measures in the PEIR will encourage the creation, planning, and protection of wildlife corridors. Please explain how wildlife corridors will be encouraged and implemented, and how success is measured by SCAG. Further, it is unclear from this language what animal classifications are included in the term “wildlife corridors.” SCAG should be clear that this includes the suite of species from amphibians to reptiles and birds to mammals—everything. And wildlife corridors are not the same as wildlife crossings or culverts. This distinction should be made and this mitigation cover all types of wildlife movement options in the PEIR.**

ORG 5-32

As noted previously, sometimes there is overlap with the Program Environmental Impact Report and Environmental Impact Statement, so both email addresses are included when submitting. This letter serves as the final of four letters on the Plan, its appendices, and environmental documents. Thank you for the opportunity to comment on Connect SoCal.

ORG 5-33

Sincerely,



Michael Wellborn
President



January 3, 2024

Submitted via email to: ConnectSoCal@scag.ca.gov and ConnectSoCalPEIR@scag.ca.gov

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

RE: Comments on the 2024 Draft Connect SoCal Land Use and Communities Technical Report

Dear Connect SoCal Team:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2024 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) called Connect SoCal's Land Use and Communities Technical Report (Report). This comment letter follows Friends of Harbors, Beaches and Parks' (FHBP) comment letter on the Plan submitted previously on December 26, 2023.

Below are our comments on SCAG's 2024 Connect SoCal Land Use and Communities Technical Report segmented by topic and chapter.

Direct quotes from the plan shown as *italics*.
Our questions and comments are in **bold**.

Land Use and Communities Technical Report Comments

Section 1 (Executive Summary)

On page 2, the Report states, "*SPM [Scenario Planning Model] results generally indicate that Connect SoCal 2024 is superior to the Trend/Baseline forecast—with highlights including nearly twice as much net growth in multi-family housing, more housing unit growth in PDAs, and reduced water and energy use in commercial and residential buildings.*" **Based on the anticipated loss of 48,000+ acres of natural lands and 8,100+ acres of farmland, please explain how Connect SoCal is superior to the baseline forecast. This is especially important in that Connect SoCal includes the environment as one of four pillars of the document.**

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

The most recent SWAP is from 2015, as indicated on page 6. It may be a comprehensive document, but it's outdated. New species were added in the last eight years and others are being considered for addition to the California/Federal Endangered Species List. **We suggest that SWAP information be supplemented with new data and information available from the California Department of Fish and Wildlife and/or US Fish and Wildlife Service for species, critical habitat, and other species monitoring in the SCAG region. The Program**

Environmental Impact Report uses much more current data. Why not this Technical Report?

Section 2.5 (SCAG SCS Land Use Priorities)

As outlined in Section 2.5.2, SCAG's Water Resolution, states "*In October 2022, SCAG's Regional Council adopted its Water Action Resolution (Resolution No. 22-647-3).*" The Resolution calls on SCAG to, "*identify, recommend and integrate into Connect SoCal 2024 policies and strategies to align investments in water infrastructure with housing needs and the adopted growth forecast and development pattern. Connect SoCal 2024's water resilience regional planning policies and implementation strategies that fulfill Regional Council's direction are included in Section 6.2.2.*" As FHBP identified in our letter on the Plan, Table 5.2 on page 184 of the Plan projects very minimal water usage decreases after the Plan is implemented. Seventy percent of water usage by a single-family home is landscaping, providing a huge opportunity to achieve greater drinking water resiliency by eliminating the use of drinking water for landscaping purposes. **Please include innovative priorities, programs, and policies for reducing the use of drinking water for residential landscaping watering.**

Section 2.5.3 (Pathways to 30x30 Strategy)

FHBP is inspired by SCAG's connection of the Connect SoCal Plan with Governor Newsom's signed Executive Order N-82-20 that aims to combat the climate and biodiversity crises by conserving 30% of California's land and coastal waters by 2030 (called 30x30). As staff knows, this Executive Order was recently codified in [Senate Bill 337](#) (Min-D). **Please incorporate SB 337 into the Connect SoCal Plan / Land Use & Communities Technical Report since 30x30 is codified now.**

Section 3.1 (Community and Land Use Patterns)

The Report states on page 9, "*Similarly, the SCAG region has incredible diversity in its built environment and land use patterns. This diversity is reflected in how people experience their communities and how that influences overall quality of life. Complete communities are important considerations in land use planning as they are places that meet peoples' essential needs (housing, mobility), the provision of goods and services, recreation and respite, and overall access to opportunity.*" **The notion of communities meeting people's needs is critical and underscores many of FHBP's overall comments and suggestions for the Plan. We agree, that's why we continue to suggest incorporating topics such as: focusing development in existing communities, called Priority Development Areas (PDAs), to enhance services and infrastructure; ensure communities have park access via walking or riding, not simply driving; continue to discourage development in Green Region Resource Areas (GRRA) so those lands can be used to meet the 30x30 goals; and use resources wisely and continue to push for greater conservation of all resources including farmlands and water.**

The Report states, "*Despite this, the underlying historical development pattern has generally resulted in Southern California remaining very automobile dependent—with 76 percent of work commutes in 2019 coming through single-occupant vehicles.*" (pg. 19) **We suggest using more current numbers—especially in light of the new remote work / work-from-home scenarios, which account for greater work-related trip reduction.**

Section 3.2 (Natural and Farmlands)

FHBP appreciates that this section mentions the enormous economic value that farmlands add to the community, **but the economic benefits realized by natural lands and recreation is ignored. Please consider including these benefits. See also the soon-to-be submitted Natural & Farmlands Coalition Letter for reports/resources to bolster this section.**

On page 10, the Report states, *“With abundant desert, mountain, and coastal habitats, some of the highest concentrations of native plant and animal species on the planet are found within our region.”* **It isn’t just the types of habitats and numbers of flora and fauna—it is also that these species are found nowhere else on the planet—i.e., they are endemic species. So, it isn’t just quantity, it is also about quality. With the anticipated loss of over 48,000 acres, this equates to a lot of endemic species being lost permanently from the planet. This should be addressed in the report.**

Page 11 of the Report states, *“Household and employment growth that degrades or develops vital habitats reduces the environmental services they provide us that are crucial to our regional economy, health, and overall quality of life.”* FHBP suggests weaving in a land ethic within this document, rather than making the document completely anthropocentric. The document treats the environment as separate from humanity, when in fact it is intertwined. As noted on the Aldo Leopold Foundation website, *“... the relationships between people and land are intertwined: care for people cannot be separated from care for the land.”* **The landscape, its ecosystem services, plants, animals, the web of life, and intrinsic value should be intertwined within this document and recognized for its contributions to human existence** (e.g., without pollinators, crops wouldn’t grow—without crops, humans don’t have food and wouldn’t survive).

Section 3.3 (Climate Hazards)

As with the Plan, risks from flood events and impacts of sea level rise are identified (pg. 17), yet the issue isn’t addressed in a deeper way via policy objectives and mitigation. Sea level rise is already causing massive damage to existing infrastructure in coastal communities, while flooding is also wiping infrastructure off the map. **SCAG must include sea level rise, coastal erosion, and flooding impacts to all forms of infrastructure in policy objectives, project infrastructure maintenance costs, and mitigation measures in the Land Use and Communities Technical Report.**

Further, **the loss of actual infrastructure (powerlines, cell towers, roads, etc.) as an impact of wildfires and landslides should be captured in this section.**

Preparation for climate hazards (such as high heat days coupled with Santa Ana winds) in the form of Public Safety Power Shutoffs should also be covered. With these shutoffs that are implemented by electric utilities, there is potential for loss of perishable food, work time, ability to travel to and from home/work/school, stay cool, and, if you are disabled, to stay alive if dependent on life saving equipment. **These preparatory systems should be addressed as an impact to Southland residents.**

Section 4.1 (Social, Economic, Natural and Built Environment Challenges)

Many cities are adopting ordinances to cover short-term rentals because of neighborhood impacts. That said, if homes are being rented for less than 30-day stays, this is housing that could be made available to the community permanently. **The housing impacts of short-term rentals and even foreign-owned investments should be acknowledged in the document.**

This section appropriately identifies the rapidly growing unhoused population in the SCAG region, up from 53,729 in 2012 to 85,000 in 2022 (pg. 14), as a crisis. While there are a number of reasons for homelessness, affordability is a primary cause. **We encourage SCAG to be innovative with housing affordability policies. Consider going beyond building affordable housing and also focus on retrofitting the 100,000+ substandard or incomplete facilities identified in the Housing Technical Report (pg. 10), and recommend jurisdictions remove in-lieu fees for affordable housing when issuing entitlements for new developments.**

FHBP applauds the discussion on page 15 of Regional Advance Mitigation Programs (RAMP); however, the Plan doesn't specifically say it will implement a RAMP. **We recommend SCAG use its regional leadership position to assist communities, cities, counties, and/or transportation/infrastructure agencies to implement new RAMP or complement existing programs to accommodate new mitigation needs (i.e. climate impacts and vehicle miles traveled).** Further, RAMPs are a strategy identified in the [Pathways to 30x30 document](#) released by the California Natural Resources Agency, specifically Pathway #5. **We encourage SCAG to call out Connect SoCal's alignment with this statewide plan.**

Section 4.3 (Resilience Shocks and Stressors)

While sea level rise does cause flooding, it is a distinct issue. Additionally, while aging infrastructure is more prone to damage by sea level rise, the concept of aging infrastructure doesn't capture the entire picture of damage done via sea level rise. **In the table on page 18, please include "sea level rise" in the shocks column because "flooding" doesn't adequately capture both concepts. Please include damage to critical infrastructure in the stressors column because "aging infrastructure" doesn't adequately capture both concepts.**

Section 5.1 (Building a Regional Growth Vision)

On page 19, the Report states, *"The growth visioning process in Connect SoCal 2024 aims to strengthen the relationship between the region's growth vision and local implementation by instead integrating sustainability considerations before local review, then assessing the collective effect of local edits on the overall development pattern."* **How will this be reported, tracked, and analyzed?**

On the same page, Table 1 shows a sizable decrease in population growth in 2019-2050 from the population growth during 1990-2019. It also shows increases in household growth in three of the six counties in the SCAG region (pg. 20). **Please explain the incongruity between the population growth and household growth in Orange, Riverside, San Bernardino, and Ventura Counties.**

On page 23, SCAG states that the Regional Growth Vision, *"Increases household growth in Priority Development Areas (PDAs), but does not require growth to be entirely in PDAs. PDAs*

are areas within the SCAG region where future growth can be located in order to help the region reach mobility and environmental goals and support complete communities.” **FHBP supports the majority of growth in PDAs as that’s where the infrastructure, amenities, and people exist—thus reducing the greenhouse gas emissions and vehicle miles traveled.** On page 24, it is estimated that the PDAs—though only 8.4% of the region’s total land area, will accommodate 67% of the region’s household growth and 55% of its total job growth through 2050. This would mean that additional policy considerations should be offered, including “sticks.” **FHBP suggests including “carrots and sticks.” Examples of carrots might be streamlined application processing, permit cost reduction/elimination. Examples of sticks might be fees for developments proposed outside of PDAs. We also strongly encourage a buffer to be extended around all PDAs in the developed (island areas) of unincorporated areas of the SCAG region.**

Similarly, the following statement is unclear and should contain an outline of strategies, such as particular fees, policies, tools or costs associated with disincentivizing development in GRRAs: “Reduces, but does not preclude household growth in Green Region Resource Areas (GRRAs). GRRAs are areas where climate hazard zones, environmental sensitivities, and administrative areas (such as military bases) where growth would generally not advance SB 375 objectives (see Section 5.3).” If, as the document states in Section 5.3 (pg. 44), a goal is to “Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption, and promote resilience,” **how does losing 48,000+ and 8,100+ acres of natural and farmlands, respectively, by 2050 in any way serve to meet that goal?**

Section 5.2 (PDAs Guiding the Forecasted Regional Development Pattern)

On page 24, SCAG states, “PDAs in Connect SoCal 2024 include Neighborhood Mobility Areas (NMAs), Transit Priority Areas (TPAs), Livable Corridors and Spheres of Influence (SOIs) (in unincorporated areas only)” and “PDAs are a technical tool to facilitate plan development and analysis and are used for different purposes in the Plan, such as growth visioning, performance measurement or grant applications.” As mentioned before, this language suggests there are “carrots” for developing in PDAs; however, in order to achieve greater success with guiding development in PDAs where development belongs, there must be “sticks” or fees and costs associated with developing outside of PDAs. **These policy statements are therefore only indicating compensation for good land use decisions, but failing to deter bad decisions.**

On page 25, the Report explains, “Livable Corridors” and the objective to “redevelop single-story under-performing retail with well-designed, higher density housing and employment centers.” FHBP supports redeveloping low-density city-centered retail strip-mall-type developments to be more efficient, higher density, transit oriented, walkable, and more attractive for the community. **Are there additional policy objectives that could be identified that ensure the buildings aren’t simply given a face-lift rather than a complete beneficial re-design? One policy objective could be to only provide transit improvements and transit investments if the re-design meets certain criteria and thresholds. Another policy objective could be to remove parking requirements in high quality transit areas.**

The discussion regarding Spheres of Influence (SOIs) on page 26 misses an opportunity to encourage buffers around 15-Minute Communities in the unincorporated areas in the SCAG

region. **Please use your political capital to encourage buffers around 15-Minute Communities in the developed (island areas) of unincorporated counties to reduce sprawl, support transit, protect natural and farmlands, improve quality of life, and encourage higher-density growth.**

The document states on page 26, “*According to the Regional Forecasted Development Pattern, 72 percent of the region’s household growth from 2019-2050 projected to occur in unincorporated areas is estimated to occur in SOIs.*” **How much of the SOI is in a PDA? It is unclear how 72% of the region’s household growth can occur in SOIs, when page 24 states 67% of the growth will occur in PDAs.** For example, the majority of SOIs in Orange County are in the foothills, mountains, and severely geographically constrained areas. **The overlap in PDAs and SOIs must be understood.**

Section 5.4 (Development Outside of PDAs)

We again reiterate our request that SCAG encourage buffers around 15-Minute Communities in the rural areas. **Please include the policy recommendation for buffers around 15-Minute Communities in the Report’s discussion on page 34.**

We believe we’ve found an error in the document. It says on page 36, 148% of jurisdictions participated, but 167 out of 197 were met with one-on-one. **How could 148% of jurisdictions have participated? Please explain.**

Section 6.1 (Equitable Engagement and Decision-Making)

The regional planning policies and implementation strategies outlined on page 39 are comprehensive and supported by data in the Plan. We believe the implementation strategies will achieve the goal stated on page 40, “*The overall goal of engagement efforts should be to reflect the needs and voices of impacted communities as clearly as possible in the plans, policies, and program developed.*” **FHBP requests benchmarks and timelines for these engagement tools, including development of the Equity Assessment Tool, Community Based Organization Partnering Strategy, pilot programs, and resource guide.**

Section 6.2 (Climate Resilience)

While FHBP applauds SCAG’s nod to promoting sustainable water use planning, practices, and storage on page 41, we cannot find the nexus between that desire and the projected 0.4% water savings over the life of the Plan identified on page 184 in Table 5.2 “*Connect SoCal 2024 Co-Benefits.*” **Please explain.**

Again, the benefits of natural resource preservation are overlooked in this section and should be addressed. [See the soon to be submitted Natural and Farmlands Coalition letter for a list of resources on the economic benefits of open space. As stated in that letter, “Parks not only generate jobs, but also economic activity, increase residential property values, reduce pollution, improve local tax revenues, increase well-being (thereby reducing medical costs), provide stormwater benefits by capturing precipitation, and much more. Nationally outdoor recreation generated \$1.1T in economic output, exceeding motor vehicle manufacturing and performing arts.”]

The issue of insurance policy cost and access should be addressed for the implementation strategy within bullet 4.

Section 6.2.1 (Nature-Based Solutions)

The Reports states, *“Many of the greatest environmental challenges facing the SCAG region, such as increasingly hot temperatures, poor air-quality, and wildfire can be partially or fully addressed by incorporating natural features or processes into the built environment.”* (pg. 42) Nature-based solutions should also be incorporated into ... nature. Acquisition of natural lands, restoration of landscapes, creation of tidal wetlands, etc., are all nature-based solutions that align with Connect SoCal, but are seemingly ignored due to the anthropocentric approach to the document. We suggest reviewing the California Natural Resources Agency’s [Natural and Working Lands Climate Smart Strategy](#) for approaches to include, such as forest management, ecological connectivity, adaptive management, combating invasive species, creating climate refugia, etc.

Section 6.2.2 (Water Resilience)

Continuing our above comment, given the record-breaking droughts the SCAG region is regularly experiencing, FHBP is surprised that the co-benefits of the Connect SoCal Plan for reducing water consumption is only 0.4%. The Report lists sustainable water infrastructure to be incorporated for improving water resilience. **These “sustainable water infrastructure” projects should be cost-effective, equitable, economically feasible, and environmentally sound, and should produce more savings than 0.4% over the life of the Plan.**

The Report lists four nature-based solutions on page 42, and we want to comment on bullet point three. Most drinking water usage in residential zonings is used for landscaping. Therefore it’s not just the types of plants planted, but the type of water used to support them. Drinking water should never be used on landscaping as it is a waste of this precious resource. **New permits for both residential and commercial projects should require stormwater catchment basins for landscaping purposes and best management practices for low impact development. We recommend that policy objectives be included in this section.**

Section 6.2.3 (Urban Greening)

While urban trees do, as the document points out, reduce air pollution, capture stormwater, and more, urban greening requires maintenance. **The appropriate management of urban trees and vegetation should be acknowledged here.**

Section 6.3 (Natural and Farmlands Preservation)

On page 43, the introductory sentence states, *“Preserving the region’s natural and farmlands will ensure that future generations will be able to enjoy Southern California’s unique landscapes as we do, and benefit from the essential resources that natural lands provide.”* Again, this anthropocentric view neglects the immense biodiversity found in the California Floristic Province and endemic species found here. These species make Southern California a unique landscape—above and beside the values they bring to the residents. **These intrinsic values should be acknowledged.**

On page 57, the Connect SoCal Plan identifies that 40,000 acres of farmland and 50,000 acres of natural lands were lost in the last decade. The Report says on page 44,

“For natural lands, 48,590 acres are anticipated to be converted to urban uses by 2050 from existing conditions. This represents 617 acres more than the Trend/Baseline and is consistent with jurisdictional feedback on locally anticipated growth. With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 18,032 acres of degraded habitat - 1,202 acres more than the Trend/Baseline. Some areas are improved, however, as Connect SoCal will result in 1,891 acres of improved habitat - 666 acres more than the Trend/Baseline. For agricultural areas, specifically, implementation of Connect SoCal will result in conversion of 8,156 acres to urban uses - a loss of an additional 1,464 acres of farmland over the Trend/Baseline. There are economic impacts due to this loss of farmland, where agricultural production value is anticipated to decline by roughly \$9 million through[the] year 2050 compared to the Trend/Baseline. With this loss of both natural and farmlands, groundwater recharge is anticipated to decline by 129,326 acre-feet - 24,862 more acre-feet than the Trend/Baseline scenario.”

The regional planning policies and implementation strategies listed on page 45 of the Report are apparently not designed to work, based on the massive loss of natural and farmlands identified on the previous page. Please explain how this loss can possibly help to reach environmental, sustainability, and natural lands/farmland goals as outlined throughout the entire Connect SoCal document and this Technical Report? Because of the massive loss of natural and farmlands projected, in addition to other sustainability goals not met such as water conservation, stronger mitigation measures are needed to offset the impacts. At this point, the impacts are significant and unavoidable in the Program Environmental Impact Report/Statement.

ORG 6-1

Page 45 of the Report goes on to say, *“Connect SoCal envisions Regional Advance Mitigation as a key pathway for natural and agricultural lands preservation, which is included as a Regional Strategic Investment that can support conservation as a means of mitigating the environmental impacts of transportation investments.”* SCAG is positioned as a leader and regional convener across many jurisdictions and agencies. This position shouldn't be ignored. **As asked in our letter on the Plan and in this letter on page 2, does this mean the RAMP will be implemented—especially in light of the fact that the Plan identifies \$1 billion available for RAMP investments? If no RAMP is actually created, how will this investment figure be reached? What is the timeline for implementation of a RAMP?**

Page 45 also states, *“In addition, SCAG’s future work will involve conducting a study to examine the economic and fiscal benefits of natural and agricultural lands preservation to support local jurisdictions’ decision making by identifying the tradeoffs of conversion of natural and agricultural lands to urban uses, including loss of groundwater recharge areas and climate pollution sequestration.”* **Is this a mitigation measure? If not, why not? How is this included in Connect SoCal?**

ORG 6-2

Section 6.4.1 (Elements of Complete Communities)

Page 47 lists Affordable Housing Authorities (AHA) as a tool that can be used to reach infrastructure and housing goals. **Local Land Trusts are another option.** See the [Newport](#)

[Beach Housing Trust](#) recently established to create affordable housing by linking public and private dollars.

Section 6.4.3 (15-Minute Communities Policies)

Urban growth boundaries, density transfers, transfer taxes (see [Martis Fund](#)), and transfers of development rights should be added to the list of options to support the realization of complete communities. (See pg. 46)

As the Report clearly defines on page 48, “*A 15-Minute Community is one in which people can access most or all their daily necessities, services, and amenities within a 15 minute walk, bike, or roll (e.g., using a mobility device) or as places that result in fewer and shorter trips because of the proximity of complementary land uses. Because key destinations are located closer together, the length or number of trips that people make is reduced.*” **In order to ensure these objectives are met, SCAG must list as an attribute that each 15-Minute Community has a buffer to encourage higher density development. Please add buffers in the bulleted list of positive attributes on page 48. Please also include buffers as regional planning policy number four for 15-Minute Communities on page 49. Preventing sprawl can be an effective policy tool to assist in meeting higher density land use objectives in developed (island areas) of unincorporated communities.**

Section 7.4 Summary of Plan Impacts and Benefits

On page 56, land consumption of greenfield land for the baseline is 78 square miles and is listed as 41 square miles under the Connect SoCal Plan. This doesn’t resonate with the data provided on page 44 of the Report. **Please explain.**

Page 56 compares the baseline and Connect SoCal Plan’s cumulative fiscal impacts to infrastructure capital. **Does the figure of \$23.8 billion under Connect SoCal include sea level rise infrastructure impacts?**

The chart on page 57 compares the baseline and the Plan’s household costs. Only transportation and utility costs are included. **Given that home insurance rates have skyrocketed in California in the last five years and now represent a larger piece of the household expenditures’ pie, a home insurance line item should be included.**

Respiratory related illness rates are not the sole indicator of community health, as the Public Health line item in the chart on page 57 seems to indicate. **The Public Health line item should include numerous other health indicators such as life-longevity, obesity rates, etc. These data are easily obtained via sources such as [CalEnviroScreen](#).**

FHBP will be submitting comments by document. Sometimes there is overlap with the Program Environmental Impact Report and Environmental Impact Statement, so both email addresses are included when submitting. This letter serves as the second of several on the Plan, its appendices, and environmental documents. Thank you for the opportunity to comment on the Land Use and Communities Technical Report.

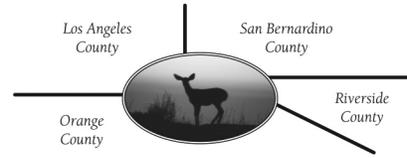
Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Wellborn". The signature is fluid and cursive, with the first name "Michael" and last name "Wellborn" clearly distinguishable.

Michael Wellborn
President

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

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



January 12, 2024

Submitted via email to: ConnectSoCal@scag.ca.gov and
ConnectSoCalPEIR@scag.ca.gov

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

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

Dear Connect SoCal Team:

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

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

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

ORG 7-1

CONNECT SOCIAL

Chapter: 1 - Executive Summary

Page: 10

Reference: "Urbanization continues to consume farmlands and open spaces, which contributes to the loss of groundwater supply and habitat areas that play a critical role in strengthening the region's resilience. SCAG will collaborate with federal, state, and local partners to ensure that the implementation of the Plan helps address existing air quality challenges, preserve natural lands, and reduce GHG emissions." (emphasis added with underline)

Comment: The document states only 1,891 acres of habitat are anticipated to be improved across six counties even though the goal is resource efficiency and we know that the population is declining (See Land Use and Communities Technical Report, page 44). Please explain how natural lands will be preserved over the life of the Plan.

Page: 12

Reference: The Plan lists the environment as one of its four core goals, along with economy, communities, and mobility.

Comment: HFE is pleased to see the environment listed as one of the four core goals of the Plan. Acknowledging the interconnectedness of the community, economy, and mobility provides opportunities for improved planning.

Page: 13

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

Comment: We agree, however SCAG has the regional leadership, experience, and clout to facilitate cross-county and regional projects on policies and programs such as the Regional Advance Mitigation Program (RAMP) and tools like the SoCal Greenprint. Since the RAMP Policy Framework was adopted last spring, we recommend focusing strategies and mitigation measures on the implementation of the RAMP.

Chapter: 2 – Our Region Today

Page: 35

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

rainstorms, coastal flooding from sea level rise, and urban heat island effects from unusually high temperatures.”

Comment: The document fails to make the connection between climate change “challenges and pressures” and tangible impacts to actual Southland residents. Impacts aren’t just to houses or roads, but people too. Only one sentence was included that connects people to high heat days. Looking at just wildfire: People endure evacuation, loss of time at work, immediate need for supplemental housing in case of housing loss, lack of basic needs following a fire (i.e., clothes, medication, food), and lack of communication ability (due to the loss of power, phone service or cell towers). Further, the lack of adequate evacuation routes, lack of redundant water system, coupled with power outages during high heat/high wind days—all have detrimental effects on people, their stress levels, and create trauma experiences. These climate-related events may happen in the region, but people live in the region and experience these impacts. The “safety of neighborhoods” isn’t enough, thus we recommend the safety of people be considered. The connection between the impacts and people should be drawn more substantially.

Page: 36

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

Comment: The connection between cause and effect hasn’t been clearly defined. Again, using wildfires as an example: wildfires burn habitat, then when it rains, this typically causes a secondary impact of mudslides and debris flows to the same neighborhood impacted by the original shock. Further, a shock can create to a chronic stressor. And, improving resilience means challenging outdated thinking and planning strategies, and using new and updated science and tools (like Wildfire Modeling). We urge SCAG to make the connection between cause and effect.

Chapter: 3 - The Plan

Page: 36

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

Comment: Some non-profits, neighborhoods, and cities/counties are planning for shocks and stressors right now. For example, the Carbon Canyon Fire Safe Council developed materials for [evacuation routes](#) for every neighborhood in the small enclaves of Olinda Village and Sleepy Hollow, in partnership with the

City of Chino Hills and Chino Valley Independent Fire Authority. SCAG can and should develop pilot programs and policies that improve public safety by addressing shocks and stressors like the strategies mentioned here.

Page: 103

Reference: "SCAG's approach of de-emphasizing growth in areas with the highest number of convergences is sensitive to market considerations. Further, the preservation and restoration of Green Region Resources Areas (GRRAs) can reduce risks from climate change and promote future resilience in the region."

Comment: We support SCAG's goal to prioritize 15-minute cities and avoid development in the GRRAs. However, it should be clarified as to why the Land Use and Communities Technical Report anticipates a loss of 48,000+ acres of natural lands and 8,100+ acres of farmland, if as Connect SoCal states, reducing the development potential on natural and farmlands is so important. The connection isn't being made about protecting GRRAs and this anticipated massive loss of undeveloped lands. This needs more clarity and clearly improved mitigation measures to reduce the impacts.

Page: 103-104

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

Comment: We strongly feel that based on the topographic, tectonic, history of liquefaction, and general land movement that "Unstable Landforms" is missing from the list of topic areas. Landslides are already a problem along the Coast as they relate to transportation infrastructure like rail lines and this is exacerbated by climate change. For example, the Orange County Transportation Authority has issued alerts related to the South Coast Rail emergency (See the [OCTA Press Release](#) from August 2023). The Authority has had to shut down service to San Diego County due to slope failures. That said, inland areas also face landslide issues. Some of these are exacerbated by the combination of rains and wildfire, but sometimes not. The SCAG region should include not only slope failures, but draw the connection to loss of life, property, and all forms of infrastructure. (See [La Conchita Landslide PowerPoint](#) [Ventura County], [Bluebird Canyon Landslide](#) [Orange County], and the [U.S. Geological Survey's PDF on Landslides](#) [Southern California].)

Page: 104

Reference: Open Space and Parks

Comment: HFE supports use of the California Protected Areas Database and the California Conservation Easement Database.

Page: 104

Reference: Endangered Species and Plants

Comment: This reads as though plants are not species. We suggest changing the category header to read: Endangered Flora and Fauna or simply calling it Sensitive, Threatened or Endangered Species.

Page: 107

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

Comment: We appreciate that natural lands and agricultural lands are identified as having these local and regional benefits. We are concerned that with only 1,891 acres projected for improvement, this number doesn't meet the policy objective. Further, the mitigation measures in the PEIR also do not support this stated goal of natural and agricultural land preservation especially considering the PEIR notes the loss of these lands is "significant and unavoidable."

Page: 109

Reference: A footnote states that the Regional Advance Mitigation Programs or RAMP was "previously a mitigation measure in the Connect SoCal 2020 PEIR (SMM BIO-2). In this cycle, the RAMP has been elevated to a plan feature, which reduces impacts."

Comment: The PEIR indicates plan features "may reduce impacts" (pg. 3-3 and 3-8). In reality, RAMP actually does reduce impacts, it also delivers projects faster, under budget, with streamlined permitting, using less staff time, more wisely using taxpayer dollars, encouraging collaborations among agencies, natural resource/permitting entities, and the conservation community, and with a stronger investment in landscape level conservation outcomes. See the [OCTA Environmental Mitigation Program](#), which has preserved 1,300 acres and restored 350 acres and the [Western Riverside Regional Conservation Authority](#), which includes a 500,000 acre habitat reserve. This is why we remain concerned about the lack of habitat improvements under Connect SoCal. The 1,891 acres identified as "improved" pales in comparison to the successes found elsewhere—with agencies that have deployed a RAMP. SCAG has the adopted policy framework, it should now be used instead of sitting on a shelf gathering dust.

Page: 119

Reference: The document states "encourage the protection and restoration of wildlife corridors."

Comment: We support this in concept, but considering SCAG has a considerable role with regional transportation projects in Connect SoCal, SCAG

should be more than “encouraging” wildlife corridors. What exact steps will be taken to protect and restore wildlife corridors? How will the needs of wildlife corridor protection be prioritized? How will it be funded? Can wildlife corridors be identified? Can funding be secured to protect or enhance the impacted corridors?

Page: 119

Reference: Policy 62 “Encourage the protection and restoration of natural habitat and wildlife corridors.”

Comment: We support this policy, but don't understand how it will be implemented and tracked. This should be clarified.

Page: 178 and 181

Reference: Rural Land Consumption (also called Greenfields) is anticipated to be reduced 48% from the baseline.

Comment: How is 48% of land consumption being reduced if only 1,891 acres end up improved in a 25-year plan. The numbers don't add up.

Section: Glossary

Page: 211

Reference: NIMBY

Comment: This term is defined in the Glossary, but isn't used in the document. Further, often times residents that simply engage on community issues are attacked for speaking out are called NIMBYs. This is a derogatory word used to limit public participation and negate/ignore comments made by those that engage in the public process. It focuses on the name calling instead of the substance of the comment. It should be removed from the Glossary.

LAND USE AND COMMUNITIES TECHNICAL REPORT

Section: 2.5.3 – Pathways to 30x30 Strategy

Page: 7

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

Comment: The link should be made that Pathway #5 is Advance Mitigation under the [Pathways to 30x30 document](#). In short, a policy framework that SCAG has adopted, can help California achieve 30x30. Yet, the Plan falls short because RAMP isn't implemented in this RTP/SCS, nor is active conservation a mitigation measure. This should change.

Section: 3.3 – Climate Hazards

Page: 13

Reference: “Economic costs from wildfires include resources involved in fighting the fires, damage to property, health care bills, costs of disrupted business, lost tax revenue, and decreased property values, and are estimated to sum to \$10 billion dollars in 2020.”

Comment: There is no mention of the human toll due to wildfires, the trauma, the individual financial burden, the stress, etc. Further, as additional fires occur, more insurance issues will be faced by homeowners that live in GRRA, which have a higher wildfire risk potential than other areas. There is no mention of this skyrocketing homeowner cost and how it actually impacts home production if the builder and future homeowners can't secure wildfire coverage (which leads to not being able to secure a home loan).

Section: 4.1 – Social, Economic, Natural and Built Environment Challenges

Page: 14

Reference: “New growth in the region can occur in a fashion that also promotes resource conservation.”

Comment: Yes, but how is this possible when more natural and farmlands are converted to urban uses with Connect SoCal than without?

Section: 5.1 – Building a Regional Growth Vision

Page: 23

Reference: Bullets 1 and 2

Comment: HFE supports growth in Priority Development Areas and the reduction of growth in GRRA.

Section: 5.3 Green Region Resource Areas Guiding The Forecasted Regional Development Pattern

Page: 28

Reference: Implementation Strategies

Comment: We support the implementation strategies to create protected natural lands, secure wildlife corridors, and fund pilot programs. We just don't understand why there is so little actually protected under the Plan, if these are the implementing strategies. More needs to be done to offset the significant loss of agricultural and natural land across the region, such as expanding partnerships, coordinating with state conservancies and local land trusts to implement the strategies that also align with 30x30 strategies, and collaborating on funding this work across the public/private sector.

Page: 30

Reference: Flammable “wildfire” vegetation references and Wildland Urban Intermix zone

Comment: We encourage SCAG to use already adopted and recognized terms. For example: Wildland Urban Interface, which is defined by the [US Fire Administration](#) as: “the zone of transition between unoccupied land and human development.” Further, while wildlands do burn, wildlands burn at a lower BTU (British Thermal Unit) than a home. US Geological Survey Researcher Jon Keeley notes: “houses burn houses down.” (See [The Best Wildfire Solutions We Are Not Using](#))

Section: 6.2 Climate Resilience

Page: 40

Reference: “One of the primary ways that SCAG supports local agencies and stakeholders in these efforts is through assisting with local climate adaptation planning. Climate adaptation planning allows communities to better understand the specific local impacts of climate change they can expect and what the community’s vulnerabilities are so that they can establish and implement strategies to proactively address them.”

Comment: We encourage SCAG to add implementing or mitigation measures that proactively combat climate change that simultaneously improve the environment such as: development buffers, native plant installation, and climate planning. SCAG should take a leadership role and develop case studies or pilot programs it funds to track climate reduction goals across the region.

Page: 40-41

Reference: “Many of the greatest environmental challenges facing the SCAG region, such as increasingly hot temperatures, poor air-quality, and wildfire can be partially or fully addressed by incorporating natural features or processes into the built environment. Known as “nature-based solutions,” these approaches are gaining traction in cities and communities around the world as strategies for adaptation and resilience to climate change, while providing social and economic co-benefits. Examples of nature-based solutions range from anything as simple as conserving existing natural lands, expanding urban tree canopy, to complex infrastructure projects such as reconstructing wetlands.” (emphasis added with underline)

Comment: Nature Based Solutions typically define solutions for modified **natural** environments, this section defined the focused only on the built environment. Therefore, this section should **also** recognize the natural environment.

Section: 6.3 – Natural and Farmlands Preservation

Page: 43

Reference: “With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 18,032 acres of degraded habitat - 1,202 acres more than the Trend/Baseline.”

Comment: Why are more natural and farmlands converted to urban uses with Connect SoCal than the baseline?

Page: 43

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

Comment: We support RAMP as a key pathway for land preservation. SCAG must take the critical next step to begin collaborating for implementation to take advantage of the 25-year horizon associated with this plan. Enabling language for RAMP should be included as a policy, implementing measure, or mitigation measure.

ORG 7-2

Page: 44

Reference: “With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 18,032 acres of degraded habitat - 1,202 acres more than the Trend/Baseline. Some areas are improved, however, as Connect SoCal will result in 1,891 acres of improved habitat - 666 acres more than the Trend/Baseline.”

Comment: We do not understand how the Plan intends to protect GRRAs, focus development in PDAs, and yet 18,032 acres of degraded habitat and only 1,891 acres will be improved. The math doesn't add up. This seems like a bigger impact than actual savings.

Section: 6.4 – Complete Communities

Page: 47

Reference: “List of tools that support realization of complete communities.”

Comment: We support the addition of a Public Safety Component similar to that under consideration in Los Angeles County related to wildfire zones. (See [Wildfire Protection Ordinance](#)) This is one way SCAG can help support reducing development in the GRRAs and ensure smarter land use decisions in Very High Fire Hazard Severity Zones.

PROJECT LIST

Section: The Project List Table

Page: 429

Reference: "Advance Mitigation/Other"

Comment: RAMPs are by their very nature focused on early permitting and project streamlining in advance of the project(s) actually being completed. With a 2050 completion timeframe for this plan, none of the mitigation will have been "advance" mitigation, which defeats the purpose of a RAMP entirely. We urge SCAG to identify implementation opportunities and collaborate with agencies to make RAMP a reality.

PROGRAM ENVIRONMENTAL IMPACT REPORT

Section: Executive Summary

Page: ES-7

Reference: Environmental Goals

Comment: How does SCAG meet its environmental goal when 48,000+ and 8,100+ acres of natural and farmlands, respectively, are lost by 2050? It seems the environmental goal doesn't achieve anything. If it did meet the goal, this number would be considerably better.

ORG 7-3

Section: Aesthetics

Page: ES-18, 3.1-23

Reference: "SMM-GEN-1: SCAG shall continue to facilitate interagency cooperation, information sharing, and regional program development, such as through existing planning tools to support local jurisdictions including various applications offered through the SCAG Regional Data Platform (RDP), SoCal Atlas, HELPR, and other GIS resources and data services. For more information or assistance, please contact SCAG's Local Information Services Team (LIST) at list@scag.ca.gov."

Comment: The SoCal Greenprint should be added to this mitigation measure as it is a tool offered by SCAG.

ORG 7-4

Section: Agricultural

Page: ES-21 and 3.2-15

Reference: The Regional Greenprint

Comment: HFE supports the SoCal Greenprint and has ever since SCAG committed to developing it in its 2020 PEIR as SMM-BIO-2. (See 2020 PEIR, pg. 3.4-71)

ORG 7-5

Section: Biological Resources

Page: ES-35, 36, 37 and 3.4-44, 45

Reference: PMM-BIO-4(k) states, "Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat)."

Comment: This mitigation measure should be expanded to include fee title acquisition and/or restoration of lands and waters.

ORG 7-6

Should you have any questions on our feedback, I can be reached at: (714) 996-1572. Thank you for the opportunity to provide these substantive comments and we look forward to reviewing the draft final plan.

ORG 7-7

Thank you,

Claire Schlotterbeck

Claire Schlotterbeck
Executive Director

Natural Lands Coalition Comments on 2024 Connect SoCal Documents



January 12, 2024

Letter ORG 8

Submitted via mail to SCAG

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

RE: Comments on the 2024 Draft Connect SoCal

Dear Connect SoCal Team:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2024 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) called Connect SoCal. In 2012, with the release of that RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition

(the Coalition) focused on the inclusion of natural lands, farmlands, and associated policies within the SCAG RTP/SCS. The Coalition continues to be diverse, inclusive, and well distributed geographically. **Our Coalition includes unincorporated community groups at the local level all the way up to national conservation non-profits.**

Direct quotes from the Plan are in *italics*.

Proposed policy modifications are underlined.

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

Resources SCAG should review and/or incorporate are in tables.

We are pleased to see SCAG advancing the preservation of the environment by including it as one of the four core goals. As stated in the plan, “*The goals for Connect SoCal are designed to help us achieve our vision. They fall into four core categories: mobility, communities, environment, and economy. These goals are not mutually exclusive—they are mutually reinforcing.*” (pg. 12) **Recognizing the interconnectedness of these core categories is a step in the right direction.**

We’ve reviewed the RTP/SCS and offer the following comments and clarifying questions for consideration in the Plan with the intent to make clearer and strengthen the Plan’s language. Further, we hope to link the goals of the RTP to SCAG’s aim of reducing greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) per AB 32 and SB 375. These goals also align well with the recently codified SB 337—protecting 30% of the state’s lands and waters by 2030—by encouraging housing placement in appropriate urban locations, while simultaneously conserving habitat lands, riparian areas, and creating climate resilient landscapes.

SCAG has a tremendous opportunity with the 2024 Plan. The State has provided ambitious reduction targets for both GHG emissions and VMT for passenger and light duty vehicles. Conservation of our natural lands can have a significant role in both. Converting land from its natural state to more urban uses increases GHG emissions—while leaving land as is, allows the vegetation and soil to continue to sequester carbon. Further, most greenfield developments are at the urban fringe in Green Region Resource Areas (GRRAs)—far from services, transit, and amenities, thus increasing both GHG emissions and VMT. **Preservation of GRRAs sites will eliminate the need for any VMT for projects that could have been built. In other words, conservation of natural and farmlands can reduce both GHG and VMT to help SCAG achieve its mandate.**

In 2023, Governor Newsom signed SB 337 (Min-D) into law requiring the state to protect 30% of California’s lands and coastal waters by 2030 (30x30). The California Natural Resources Agency has identified in its [Pathways to 30x30 document](#), 10 strategies to achieve this. These include concepts like executing strategic land acquisitions to institutionalizing advance mitigation. There are also three priorities: protect and restore biodiversity, expand access to nature, and mitigate and build resilience to climate impacts. **SCAG has an unprecedented opportunity to align Connect SoCal and its strategies and policies with the existing 30x30 effort. We collectively urge SCAG to capitalize on this opportunity.**

Much of the last four years has been spent by the Coalition engaging on the SoCal Greenprint and in SCAG's Natural and Farmlands Working Group. **The Coalition continues to believe SCAG has the leadership in place, the right staff at the helm, the homework done, the support by the conservation community, and the interest and attention of the permitting agencies to now transition to implementing conservation activities.** This is your opportunity to walk the walk, instead of simply talking the talk. We stand ready to help conserve and restore land throughout Southern California for the benefit of its millions of residents.

First and foremost, we applaud your efforts at community engagement in the development of the 2024 Plan. SCAG partnered with 16 community based organizations, FHBP included, that hosted 20 pop-up events and collected over 3,600 survey responses. This engagement was integral to developing a plan that reflects the needs and desires of the region. We hope this outreach and engagement continues with plan implementation. That said, **we were disappointed with the comment submission limitations on the SCAG website, which allows one comment at a time (up to 25) to be submitted by one individual entity. This approach, while it makes sense to organize comments at SCAG's end, hinders public participation from the community side—especially Coalitions.** While we outreached to staff to solve this problem and submit the letter electronically, not everyone else likely had this wherewithal.

The Coalition has two general questions:

1. The Connect SoCal Executive Summary states on page 10, "*SCAG will collaborate with federal, state, and local partners to ensure that the implementation of the Plan helps address existing air-quality challenges, preserve natural lands, and reduce GHG emissions.*" **How will SCAG ensure these three important objectives are achieved during the Plan's implementation? There are performance measures, but not consequences if goals aren't met.**
2. We understand the baseline population is updated every five years. However the past five years, in particular, changed the working and living landscape for the foreseeable future and these changes aren't included in the 2019 baseline. **How were the Plan's policies adjusted given the stated decline in the region's population from 2019-2023 and the recent trend of working from home post-COVID? We believe a stronger explanation of this noticed trend is warranted within the document—even if it is called out as a footnote.**

CONNECT SOCAL EXECUTIVE SUMMARY

The Plan states, on page 10, "*The impacts of climate change also exacerbate underlying health risks in vulnerable and historically marginalized communities. In addition, urbanization continues to consume farmlands and open spaces, which contributes to the loss of groundwater supply and habitat areas that play a critical role in strengthening the region's resilience. SCAG will collaborate with federal, state, and local partners to ensure that the implementation of the Plan helps address existing air-quality challenges, preserve natural lands, and reduce GHG emissions.*" **How exactly will SCAG effectively collaborate with all its jurisdictions, county transportation commissions, and the environmental community to ensure the Plan's environmental goals are met?**

CHAPTER 2: OUR REGION TODAY

2.2 NEW AND EVOLVING TRENDS

Resilience

According to the Plan, “Resilience is defined as the capacity of the SCAG region’s built, social, economic, and natural systems to anticipate and effectively respond to changing conditions, acute shocks and chronic stressors by creating multiple opportunities for a sustainable, thriving, and equitable future.” (pg. 36) The Coalition believes SCAG does a good job of considering the resilience in economic systems, natural systems, and social systems, but falls short of examining resilience to the built environment. **Given the stressor of sea level rise, we recommend that SCAG closely examine the vulnerabilities at the coast and provide policies to implement to ensure our built systems such as transportation and utilities can withstand the challenges posed by sea level rise.**

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

Author	Resource
Ocean Protection Council	Sea Level Rise Policy Guidance
California Coastal Commission	Critical Infrastructure

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

SECTION 2.3 REGIONAL CHALLENGES

We applaud SCAG for its excellent effort to engage as many community members, community-based organizations, and stakeholders’ input to inform the development of the Plan. The effort made the Plan better and validated its policies. Our regional challenges to building more housing are summarized well in the statement, “*Not only does it include construction costs, such as the cost of land, materials and labor, but local land use entitlement processes and environmental requirements can also add cost to the process.*” (pg. 49) **Another core challenge that requires examination is land availability to construct the region’s needed housing through 2050.**

CHAPTER 3: THE PLAN

On page 78, the Vision and Goals are outlined in terms of Leadership, Implementation, and Evaluation. Evaluation is a measurement of implementation, and **we would like further information regarding the benchmarks used for the evaluation and monitoring.**

SECTION 3.2: THE HEART OF THE PLAN

A Vision for 2050

According to the Plan on page 85,

“*Environment:*

- *Create a healthy region for the people of today and tomorrow*

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

Given the vision outlined for the environment, and given the reduction in predicted population growth coupled with the increased environmental stressors, what policies in particular will accommodate these facts? There are performance measures, but not consequences if goals and subgoals aren’t met. How will SCAG ensure these goals and subgoals are achieved during the Plan’s implementation?

Priority Development Areas (PDAs)

We acknowledge the regional challenge associated with needing new affordable housing to accommodate our growing population, and the simultaneous challenge with making sure those new units are built near transit areas, is city-centered, is walkable/bikeable, and does not build on greenfield sites or high risk areas (like those prone to wildfires or sea level rise). Additionally, during the public engagement process, thousands of people across the region reflected on the challenges facing Southern California, and the community’s top concerns are: housing affordability, limited reliable travel options other than driving, and climate change impacts.

PDAs account for 8.4 percent of the region’s total land area, and according to the Plan, implementation of SCAG’s recommended growth strategies will help these areas accommodate 67% of forecasted household growth and 55% of forecasted employment growth between 2019 and 2050. **What are SCAG’s strategies for ensuring this is accomplished?**

Green Region / Resource Areas (GRRAs)

On page 103, **we support SCAG’s effort to de-emphasize development in areas that fall under multiple convergences of GRRAs given the higher level of environmental impacts that would require additional mitigation measures.**

Natural and Agricultural Lands Preservation

On page 107 of the Plan, in addition to the environmental and community benefits, these lands hold enormous economic values related to agricultural product sales, agricultural employment, enhanced viewshed and therefore increased property values, recreational spending, to name some. **SCAG should also acknowledge the economic benefits of natural and agricultural lands.**

The Future of Prosperity

Tourism

The Coalition appreciates SCAG’s attention to tourism and recreation in the region. From the local and regional parks and coastal resources to the state and federal ones—Southern California has many opportunities to enjoy and recreate in the protected lands and waters regardless if you live/work in the region or are here as a tourist. **What’s missing from this section is an accounting of how access to parks and the coast substantially contribute to the economy.**

Parks not only generate jobs, but also economic activity, increase residential property values, reduce pollution, improve local tax revenues, increase well-being (thereby reducing medical costs), provide stormwater benefits by capturing precipitation, and much more. Nationally outdoor recreation generated \$1.1T in economic output, exceeding motor vehicle manufacturing and performing arts.

We recommend the following information be analyzed for inclusion in the Plan:

Author	Resource
National Recreation and Parks Association	The Economic Impact of Local Parks
The Trust for Public Land	The Economic Benefits of the Public Park and Recreation System in the City of Los Angeles, California
Headwaters Economics	The Outdoor Recreation Economy by State
Institute for Local Government	The Economic Benefits of Open Space, Recreation Facilities and Walkable Community Design

SECTION 3.3: REGIONAL PLANNING POLICIES

Environment

On page 118, policy 53 states supporting investments to reduce hazardous air pollutants and GHG emissions. **Are there specific investments SCAG can prioritize and encourage?**

On page 119, policy 59 correctly identifies that the economic benefits of natural and agricultural lands must be prioritized. SCAG recognizes economic benefits of these natural and working lands. **We encourage SCAG to also acknowledge the existence of harder to quantify economic benefits in terms of viewsheds and their relationships to increased property values and well-being.**

Policy 62 on page 119 encourages the protection and restoration of wildlife corridors. **What implementation or mitigation measures will encourage the development and protection of wildlife corridors?**

ORG 8-1

Policies 67, 68, and 69 on page 119 provide an incredible opportunity to promote individual residential and commercial water storage activities. There are many places throughout the Plan where rainwater storage capture could be required prior to the issuance of a building permit. This is an opportunity for SCAG to take a localized approach to water management. For example, [King City, CA](#) requires all new development to capture all stormwater onsite and recharge the aquifer onsite—going above and beyond related state regulations. This is another way for SCAG to plan for the forecasted shocks and stressors as outlined in Section 2.2. **Has SCAG explored recommending such permitting restrictions?**

Section 3.4 Plan Fulfillment

Natural and Agricultural Lands Preservation

On page 132, SCAG is leading the identification and leveraging resources for, “*research, policies and programs to conserve and restore natural and agricultural lands.*” **Has SCAG developed criteria for identification?**

Also on page 132, SCAG is the lead to, “*Explore opportunities to increase and quantify the carbon sequestration potential and resilience benefits of natural and agricultural lands—and pursue funding for implementation and demonstration projects.*” **We request that SCAG ensure the added economic benefits of agriculture land viewsheds and open space / recreation are not only considered, but also included.** Further, chaparral habitat is found in all SCAG counties. Information related to sequestration potential for this habitat type would benefit the entire SCAG geography. **We request SCAG provide details on how it intends to quantify sequestration potential. And, how will implementation and demonstration projects be selected?**

Section 4.2 Economic Outlook

Overview

SCAG’s financial model should also include the availability of raw land.

Retail Sales Growth

SCAG should include in this section **retail sales growth from open space / recreation activities. Also, open space / recreation activities are generally not impacted by economic slowdowns and recessions; rather usage increases—as seen during COVID.**

Section 5.1 Performance Outcomes

Performance Monitoring

Plan Performance

On page 176, the Environment plan performance is identified as, “*Will people and our environment become healthier?*” The Plan outlines specific metrics for environmental health (i.e., air quality, wildlife corridors, increased quantity of flora and fauna). **It isn’t clear from the Plan what “healthier” looks like for SCAG residents. Please define this.**

Table 5.1 outlines Performance Measures, baseline conditions, conditions with Connect SoCal, and the trend. On page 181, the table lists: “Park Accessibility” with two performance measures:

1. “*Share of population able to reach a park within 30 minutes by auto*”
2. “*Share of population able to reach a park within 30 minutes by transit*”

This car-centric focus goes against the concept of a 15-minute city, urges people to continue to use GHG intensive methods to get to parks, and is outdated in its approach. **SCAG should focus on a 15-minute walk or ride to a park. The Trust for Public Land has a tool that calculates a community’s “[ParkScore](#),” which provides on-the-ground information about park equity for communities and the greater SCAG region. These performance measures should be redrafted to focus on pedestrian-oriented access to parks.**

Also on page 181, the table indicates that the baseline land conversion to urban purposes is 78 square miles and under Connect SoCal it is 40. The Comparative Benefit Analysis (p. 184) indicates a savings of 37 square miles (**should it be 38 square miles saved?**), which would equate to 24,320 acres. **If Connect SoCal actually achieves land preservation as is identified in the Comparative Benefit Analysis, then why does the Land Use Appendix (pg. 44) only identify 1,891 acres as “improved” or ~2.8 square miles?** Further, there are inconsistencies between the Connect SoCal baseline numbers and natural lands conversion with those found in the Land Use Appendix. **Connect SoCal and the Land Use Appendix that should match acreages/square miles.**

Glossary

The Coalition believes that the SB 337 should be added to the Glossary in that it directly ties to SCAG’s Plan and performance measures.

LAND USE APPENDIX

Section 2.4 California State Wildlife Action Plan (SWAP)

The most recent update of the SWAP is from 2015 and is therefore almost nine years old. **Can the information be supplemented with new data and information available by the California Department of Fish and Wildlife and/or United States Fish and Wildlife Service?**

Section 2.5 SCAG SCS Land Use Priorities

Given the importance and adoption by SCAG’s Regional Council of the SCAG Climate Resolution, **we request again that SCAG add mitigation measures for disruptions to services from infrastructure damage due to sea level rise.**

ORG 8-2

As outlined in Section 2.5.2, SCAG’s Water Resolution, “*In October 2022, SCAG’s Regional Council adopted its Water Action Resolution (Resolution No. 22-647-3).*” The Resolution calls on SCAG to, “*identify, recommend and integrate into Connect SoCal 2024 policies and strategies to align investments in water infrastructure with housing needs and the adopted growth forecast and development pattern.*” *Connect SoCal 2024’s water resilience regional planning policies and implementation strategies that fulfill Regional Council’s direction are included in Section 6.2.2.*” **We encourage SCAG to think outside the box and truly be innovative in recommending water resilience and conservation policies, including strengthening stormwater aquifer recharge policies, and residential rainwater catchment for landscaping. As we’re all aware, 70% of water usage by a single family home is landscaping which provides a huge opportunity to achieve greater drinking water resiliency by eliminating the use of drinking water for landscaping purposes.**

Section 2.5.3 Pathways to 30x30 Strategy

As mentioned above, we are encouraged by SCAG’s connection of the Connect SoCal Plan with Governor Newsom’s signed Executive Order N-82-20 that aims to combat the climate and biodiversity crises by conserving 30% of California’s land and coastal waters by 2030. **Since SB 337 now codifies 30x30, it should be incorporated into the Plan. SCAG’s work can easily align with SB 337 and meet local, regional, state and federal conservation goals. Further,**

there are co-benefits to protecting landscapes including securing cultural, paleontological, and archaeological sites for permanent preservation.

Section 3.2 Natural and Farmlands

We appreciate the mention that Southern California, as part of the California Floristic Province, is one of the 25 top biodiversity hotspots on the planet. Unfortunately, we lost 50,000 natural lands acres and 40,000 acres of farmland between 2012 and 2019 to development. This is unacceptable because it's unsustainable, and it doesn't align with the State's 30x30 Goals. One way to combat the loss of such valuable lands is to place the proper value of these lands. Natural and farmlands are not vacant lands, but resources that have value above and beyond what's listed by SCAG on page 11. **Please ensure other values such as viewshed values, ecosystem services, and recreational spending are included.**

Section 4.3 Resilience Shocks and Stressors

In the chart on page 18, infrastructure failure is listed under a shock and aging infrastructure is listed as a stressor. **Please provide additional mitigation measures and policy objectives related to infrastructure damage or loss due to sea level rise.**

ORG 8-3

Section 5.3 Green Region Resource Areas Guiding the Forecasted Regional Development Pattern

Rare, Threatened and Endangered Species and Plants & Sensitive Habitat Areas

On page 31 of the Technical Report, there is listed multiple data resources for inventories, status, and locations of rare plants and animals in the SCAG Region and beyond. **We encourage SCAG to supplement the old, 2015 data in the SWAP with more relevant data from these sources when considering any policies and mitigation measures.**

Section 5.5 Growth Forecast and Local Data Exchange (LDX)

On page 36, it states, "*as part of the Local Data Exchange (LDX) process, SCAG conducted a survey to better understand the trends, existing conditions and local planning in the region....Of the 197 jurisdictions in the SCAG region, 46 percent completed the LDX Survey and provided integral feedback to frame local planning. Key findings include: Environmental - The most common natural lands conservation strategies used by local jurisdictions are development impact fees (47 jurisdictions), tree planting or other urban heat mitigation (40 jurisdictions), and hillside/steep slope protection (37 jurisdictions).*" **Please describe what SCAG learned from local jurisdictions regarding how the development impact fees are used to mitigate the environmental harms the fees were generated for.**

Section 6.3 Natural and Farmlands Preservation

As mentioned above, **the complete values of natural and farmlands should be considered when discussing its preservation. We also encourage the evaluation of local jurisdictions' success in using development impact fees collected to actually mitigate environmental harms. We express our strong support for the implementation strategy listed on page 45, "Work with implementation agencies to support, establish, or supplement Regional Advance Mitigation Programs (RAMP) for regionally significant transportation projects that help mitigate environmental impacts and reduce per-capita Vehicle Miles Traveled (VMT), and provide enhanced data on mitigation opportunities through the Intergovernmental Review**

Process.” We believe regional mitigation projects and programs are more successful than individual local jurisdictional efforts to mitigate project impacts.

Section 7.4 Summary of Plan Impacts and Benefits

In the chart on page 55, comparing household mix (single family, townhome, multi-family) between the baseline (no Connect SoCal Plan) and the 2050 End State, or Connect SoCal Plan, the numbers could be better. While there shows a decrease in single family homes as an overall percentage, the increase in townhomes and multi-family homes are minimal. **Based on all the studies and data, we know that single family homes were over-built in the 1980-2000s. We anticipate the Connect SoCal policies and strategies would increase the number of multi-family permitting much greater than is outlined. If in fact, PDAs will be the focus of growth, the number of single family residential units would be lower than townhome and multi-family units, but it is not. Why?**

On page 57, the Coalition has numerous comments on the data presented:

- **Why are home insurance costs not represented in the household costs section?** The cost of home insurance has skyrocketed in the last five years, so much so that the majority of traditional homeowner insurance carriers have pulled out of the state (All State and State Farm), have excessive premiums for existing policy holders, and/or are creating staggering burdens on lower and middle income families. **Only including transportation and utility costs does not present a complete picture of contemporary household costs in the SCAG region.**
- **Why is the only public health data point related to respiratory health costs?** There are myriad health related data points that should be included such as obesity rates, longevity rates over time, birth rates, and exposure to toxins, pesticides, particulate matter, and contaminated groundwater. **Please review and include data from [CalEnviroScreen](#).**
- **In the Land Conservation section of the chart, we have the following concerns:**
 1. **Why is the active farmland and natural land converted HIGHER with Connect SoCal versus the baseline?**
 2. **Why is the habitat degraded only 1,202 acres less under the SoCal Plan versus the baseline?**
 3. **Why are the agricultural areas converted to urban lands 1,464 acres higher under the SoCal Connect Plan versus the baseline? Isn't the Plan supposed to improve the rate of conversion?**

**PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT (PEIR) /
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT (PEIS)**

The PEIR/PEIS includes two types of mitigation measures: SCAG Mitigation Measures (SMM) and Project-Level Mitigation Measures (PMM).

Implementation Strategies

The Implementation Strategies (pg. 2-26 through 2-28) fail to adequately align with the proposed goals of Connect SoCal and the Project List. For example, to align with the goals and subgoals in the Plan, **the implementation strategies should include:**

- **A GHG / VMT Regional Advance Mitigation Program (RAMP).**

- **Actively funding conservation and restoration of natural and agricultural lands by willing seller landowners (instead of continued “research” activities.)**
- **Funding implementation of climate resilience projects (i.e, stormwater and rainwater capture, wetland restoration, wildland-urban interface restoration, managed retreat, freeway/roadway hardening, urban greening, community gardens, etc.)**
- **Support partner agency and non-profit applications to preserve and restore natural and farmland conservation and restoration.**
- **Develop toolkits of policies that combat climate impacts, including using nature-based solutions.**

ORG 8-4
(cont.)

Aesthetics

SCAG should include the SoCal Greenprint in SMM-GEN-1 (pg. 3.1-23), which we proposed to be modified to read:

“SCAG shall continue to facilitate interagency cooperation, information sharing, and regional program development, such as through existing planning tools to support local jurisdictions including various applications offered through the SCAG Regional Data Platform (RDP), SoCal Atlas, HELPR, SoCal Greenprint, and other GIS resources and data services. For more information, please contact SCAG’s Local Information Services Team (LIST) at list@scag.ca.gov.”

ORG 8-5

Agricultural Resources

The Coalition supports the SCAG Mitigation Measure (SMM) Agriculture (AG), specifically SMM-AG-2 and -3. We hope that the recent progress on the SoCal Greenprint allows it to be launched in 2024 with the support of both environmental and building interests.

ORG 8-6

Air Quality

A GHG/VMT RAMP could further offset environmental impacts from Connect SoCal. SCAG has identified VMT mitigation measures in the Project List (see pg. 430) of \$500M, but fails to include a mitigation measure in the PEIR/PEIS to this effect. **To actually reduce GHG and VMT, SCAG should add a SMM that creates a GHG/VMT-centric RAMP. This mitigation measure would offset impacts from transportation projects not yet covered by a RAMP.** For example, the Orange County Transportation Authority’s Environmental Mitigation Program focuses on 13 freeway projects, but ignores the consequences of GHG and VMT from freeways, streets/roads, and transit for the remainder of the Authority’s transportation sales tax measure.

ORG 8-7

Biological Resources

Under the Biological Resources section (BIO), SMM-BIO-1, it states (page. 3.4-35), *“SCAG shall support research, programs, and policies that identify, protect, and restore natural habitat corridors and continue support for preserving wildlife corridors and wildlife crossings through information sharing, such as showcasing best practices and regional collaboration forums like SCAG’s Natural and Farm Lands Conservation Working Group.”* **To help meet the Plan’s goals to reduce land conversion, SCAG should actively support preservation of natural lands by agencies and land trusts/conservation groups, instead of simply focusing on the**

ORG 8-8

research, programs, and policies behind the preservation. This will result in quantifiable acreages protected and restored.

Due to the anticipated conversion of approximately 40 square miles of habitat into urban uses (See Connect SoCal, pg. 181), **the Coalition recommends that the PEIR include a SMM that creates fine-scale vegetation mapping of natural lands for the SCAG region to be incorporated into the SoCal Greenprint.** This will help public agencies and developers use mapping of plant taxa and vegetation types to improve project planning—especially as it relates to regional advance mitigation.

ORG 8-8
(cont.)

PROJECT LIST

The Project List includes on page 429, \$1B for RAMP with an anticipated completion date of 2050. The purpose of RAMP is early permitting and project streamlining in advance of the project(s) actually being completed. **If 2050 is the anticipated completion date of the RAMP, then none of the mitigation will have been done in advance. The mitigation needs to be front loaded with early investment opportunities. If SCAG is serious about offsetting impacts through RAMP, the mitigation program(s) should be set up in advance—in the next five to seven years of this ~25 year plan.**

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

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

Sincerely,

Michael Wellborn
President
Friends of Harbors, Beaches and Parks

Claire Schlotterbeck
Executive Director
Hills For Everyone

Gayle Waite
President
Laguna Canyon Conservancy

Sharon Musa
Urban to Wild LA Program Manager
The Wilderness Society

Garry Brown
Founder & President
Orange County Coastkeeper

Dan Silver
Executive Director
Endangered Habitats League

Shona Ganguly
Associate Director, Southern California
External Affairs
The Nature Conservancy

Elizabeth Reid-Wainscoat
Urban Wildlands Campaigner
Center for Biological Diversity

Melanie Winter
Founder & Director
The River Project

Gillian Martin
Director of Cavity Conservation Initiative
Cavity Conservation Initiative

Janet Cobb
Executive Officer
California Wildlife Foundation

Jack Eidt
Co-Founder
SoCal 350 Climate Action

Ed Amador
President
Canyon Lands Conservation Fund

Elizabeth Wallace
President
Orange County Chapter of the California
Native Plant Society

Terry M. Welsh, MD
President
Banning Ranch Conservancy

Charles Klobe
President
Still Protecting Our Newport (SPON)

Claire Robinson
Managing Director
Amigos de los Rios

Penny Elia
Chair
Save Hobo Aliso Task Force, Sierra Club

Ray Chandos
Secretary Treasurer
Rural Canyons Conservation Fund

Susan Chamberlain
President
OCInterfaith Coalition for the Environment

Gloria Sefton
Co-founder
Saddleback Canyons Conservancy

Garry Brown
Executive Director
Inland Empire Waterkeeper

Thomas Anderson
Administrative Director
Amigos de Bolsa Chica

Nancy Gardner
President
Orange Coast River Park Conservancy

Helen Higgins
Board Member
Friends of Coyote Hills

Lee Paulson
President
Responsible Land Use

Scott Thomas
Conservation Committee Vicechair
Sea and Sage Audubon Society

Elizabeth Lambe
Executive Director
Los Cerritos Wetlands Land Trust

Karin Vardaman
Executive Director
Laguna Canyon Foundation

Bettina Rosmarino
Land Acquisition Director
Oswit Land Trust

Marcia Hanscom
Co-Founder
Coastal Lands Action Network (CLAN)

Belen Bernal
Executive Director
Nature For All

Patricia Martz
President
California Cultural Resources Preservation
Alliance, Inc.

Comment ID: 0001697.01

Affiliation: Rail Passengers Association of California

Submitter: Brian Yanity

Submission:

Hello! Good morning. My name is Brian Yanity, with the Rail Passengers Association of California, and I'm interested in the project list. I looked online at the materials there. You know the draft EIR, and the draft plan, and I couldn't find the project list anywhere. Is there some appendix it's in or something?

ORG 9-1



January 12, 2024

Dear SCAG,

Thank you for this opportunity to comment upon Connect SoCal. I write as a lifelong Los Angeles County resident. For the past twenty years, my professional and scholarly work has focused on the Inland Empire—on San Bernardino and Riverside Counties. I have a special interest in logistics, warehouse environmental impacts, and the ports, as well as in public health, environmental, agricultural, and climate issues. I am embedded in a major mapping project of the region as well as in teaching, learning, and research around climate resilience and multiple forms of planetary crisis (biodiversity loss, toxicity, waste, ocean health, etc.).

ORG 10-1

As a beginning note, I wanted to flag that the appropriate document to comment upon was difficult to find. I spent most of my time reading through the Connect SoCal Plan and technical reports, rather than the PEIR, because I thought the Connect SoCal Plan and associated documents were the targets for comment. I saw the PEIR only yesterday, as it was located on a sidebar of the website rather than a direct link in the request for comments. This was confusing and has limited my ability to produce CEQA-specific commentary. My hope is that these comments will be applicable regardless. I wanted to flag this in particular because, if I had issues figuring this out, likely other commenters did as well.

ORG 10-2

In terms of climate change, last year was the hottest year on record. This year is predicted to exceed that. Our ocean is warming at twice the rate of other regions due to a particular geographic phenomenon known as upwelling. Immediate-term change with a **2030** target is imperative if we are to have any chance at all of not triggering multiple tipping points that will irrevocably change our lives and create cascading climate impacts. 2030 itself might be too late—and 2050 is unimaginably so from a climate perspective. We need to do all we can as a region *in the immediate term* in order to plan for and respond to climate change. SoCal Connect has many opportunities to be part of that imperative, but doesn't go far enough. Some additional ideas are outlined in what follows, which treats the relationship between Connect SoCal and Greenprint Data, notions of Consultation and Community input, Goods Movement issues and climate change, preservation of Farmland and Open Land and their need for an analysis of carrying capacity of the region for the Goods Movement. More broadly, I ask that SCAG recheck assumptions about population growth and consider scenarios of economic reshoring. I am also requesting an articulation and/or plan for dealing with the fact that some aspects of the plan are in clear conflict with one another.

SCAG is responsible for convening “local governments and agencies to address regional transportation, land use, and other issues of mutual concern” and its mission is to “foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing and promoting best

practices.” Values of openness, leadership by example, impact, and courage are excellent aspirational goals that both underpin and need development within the Connect SoCal Plan.

Connect SoCal and Greenprint Data

Upon first reading through the Connect SoCal document, I was reminded of SCAG’s years’ long delay of the SoCal Greenprint Dataset, which I understand will go to Council Feb 1, albeit in a truncated form. The delay and limitations around it are truly a loss, as the full Greenprint at this pivotal time in history would have created opportunities for spatially-driven data analysis to determine the scope of problems, appropriate or problematic land uses, and strategies for solutions in Connect SoCal. SCAG’s difficulty in navigating multiple political pressures in order to move forward with these materials has been a loss to Southern California communities during this planning process of Connect SoCal, especially as our near future is impacted by extreme weather as well as localized patterns of unchecked environmental injustice. Regional planning without the excellent dataset that was tailor made for our region is at best a lost opportunity and at worst a violation of the public trust. As a longtime supporter of the SoCal Greenprint, I have been disheartened with the divorce of the dataset from the RAMP (Regional Advance Mitigation Plan) as well as the desire to suppress justice and equity layers or ruling out the use of terms such as “the best available science.”

My concern is this: If Connect SoCal’s discussions of development, equity, open and working land conservation, biodiversity, water health, tree canopy, climate vulnerabilities and more did not use the best available data due to political interference (ie. the BIA – Building Industry Association, BizFed, and the Southern California Leadership Council), that is a potential interference in the CEQA process for Connect SoCal. It has limited data transparency and also a potential misuse of public funds. That is clearly a broader problem with the Greenprint’s history within SCAG but it also impacts this PEIR directly.

ORG 10-3

The highly politicized process with the SoCal Greenprint colored my reading of Connect SoCal. It made me question the framing language of the document around innovation, transparency, justice, equity, climate, information sharing, and community engagement. Though much of the document reads well on paper, some of it rang hollow, in part due to the suppression of the Greenprint from the public eye. The problem is that the public has been denied access to the data and the ability to use these data in order to understand the region’s issues as presented in Connect SoCal, which has minimized our ability to join in the discussion in meaningful ways. Indeed, publicly available Greenprint data might have allowed a more significant, informed, and meaningful community engagement process on the part of everyone from municipalities to nonprofits to environmental organizations. I also want to recognize SCAG staff who have clearly worked hard on this document whose work on Connect So Cal might have benefited by this robust dataset had it been available in full and in its public form.

Consultation and Community Input

At various points in the document, the word “consultation” is used. In terms of community engagement processes, consultation is on the weaker end of the spectrum of engagement. True community engagement would involve a cultural shift at SCAG that I encourage you to build into Connect SoCal as an aspirational goal. Establishing specific metrics for involvement would be important and fall in line with best practices as well as SB 1000. Even though SCAG is not a government agency, Connect SoCal articulates a desire for meaningful community and stakeholder engagement. Because SCAG leads government agencies, it also has the ability to incentivize, train about, and encourage momentum around compliance with SB 1000 among local municipalities. I ask that these goals be included in the form of true community engagement for the region.

Community-engaged planning is critical in disadvantaged communities and environmental justice communities that are already impacted by locally unwanted land uses, many of which are noted in the Plan. This is in part because:

- Historic inequities and the siting of toxic facilities in proximity to DACs and EJ communities have decreased land values, leading to intergenerational cycles of detrimental project siting.
- Evaluating individual projects within individual municipalities puts collective and regional impact and planning on the back burner. A single project generally has a much broader impact than the parcel of land where it is built, joining with other past, present and future projects. Corporate capital and developer influence have shifted the loyalties of local decision makers away from residents, despite vocal opposition to health or environmental detriments that are deemed "significant and unavoidable." But community members experience their lives, regions, and neighborhoods holistically, thus providing an important lens to view any specific project.
- Community voice is easily tokenized, ignored, or coopted by the current planning process, resulting in box checking and lack of democratic engagement.

ORG 10-4

Regional planning and support of community-led planning by SCAG is badly needed. In terms of Connect SoCal, meaningful community-engagement is important because community members are intimately tied to neighborhoods and understand the potential impacts of projects, the specific problems they face, and potential solutions better than anyone. Residents have unique insights into sustainable planning for long-term success and quality of life.

Considering community members as experts in full collaboration should be named and prioritized in Connect SoCal even if this model has not been used in the development of the plan. A stated goal to help municipalities move from consultation to collaboration and, eventually, community control would be appropriate, for example.

Goods Movement—Climate change, Trade Loss Scenarios, and Reshoring of the Economy

The technical document about Goods Movement needs to consider climate change among the other supply chain challenges listed. Right now, the Goods Movement technical report references COVID-19, security issues, labor issues, and changing supply chain dynamics. A major omission among these is climate change, which will massively impact our home ports and ocean resources, and those of our trading partners, who will also be facing increased drought, heat, flooding, monsoons, typhoons, wildfires, and storm surges. SCAG projections predict triple the growth of TEUs entering the ports by 2035. But it's also important to consider opposite: trade-loss scenarios due to strategic choice and/or the following:

- Some of the most critical port infrastructure globally exhibits low climate planning and high climate vulnerability; Asian ports are extremely vulnerable to sea level rise and flooding, which will impact Southern California imports and thus its economic role. Some of the below is contained in a report about partner port climate vulnerability we recently conducted if you wish further information.
- Major changes to the viability of shipping routes will occur within the next 5-10 years due to climate change: The Panama Canal may become compromised due to lack of freshwater resources; US Gulf and Eastern ports within the US may become compromised; the Arctic is projected to be ice free by 2030 and will likely open as a shipping corridor, which will shift global trade routes; maritime chokepoints for food and goods need further assessment.
- Rapidly changing climatic conditions, more frequent and intense storms, feedback loops leading to increased atmospheric and oceanic warming, and sea level rise will create different impacts around the globe. The next five to ten years will increase the severity and duration of disruptions to global trade to and from Southern California, particularly impacting low-lying Asian port infrastructure especially in China, Japan, Korea, and surrounding populations. Our own ports are also at risk, though less so. These vulnerabilities will combine with additional disruptions, such as those experienced during the pandemic, as well as changing policies, tariffs, and security issues that are outlined already in Connect SoCal.

The Intergovernmental Panel on Climate Change (IPCC) reports “widespread, rapid, intensifying” challenges—in other words, our changing climate is producing faster and more intense warming patterns and disaster impacts than previously anticipated (IPCC 2021). Maritime communities have recognized the need to collaborate around climate issues, forming groups such as the World Port Sustainability Program, World Port Climate Action Program, and the Just Transition Maritime Task Force (IAPH 2018, IAPH 2023, MJTTF 2022). In addition, several reports have been published regarding shipping vulnerabilities due to tropical storms, ocean warming, and sea level rise due to the melting of the polar ice sheets. The periodic, paced, and semi-manageable disruptions of today will follow the same pattern as climate change, leading to increasingly rapid cycles of intense flooding, fire, and drought at many of our trading partner ports. Planning for these impacts is imperative. Connect SoCal needs to project and plan for what the goods movement may become in the next decades due to climate challenges. These need to be treated explicitly in

the Goods Movement plan and might be considered in the following ways within Connect SoCal projections:

- Assess trade relationships and port infrastructure through a climate lens.
- Assess the climate vulnerability of maritime chokepoints and how they will impact the SoCal region, the viability of our region, our ability to get food and goods, and our quality of life; plans for if these things are compromised.
- Assess the impact of possible compromise or loss of the Panama Canal and Asian, Gulf, and Eastern Seaboard ports and the opening of the Arctic on Southern California trade and transportation.
- Develop tiered trade-loss scenarios as part of *intentional* long-term climate vulnerability planning; assessing what portion of port imports and exports can be relocalized or reshored for and by SoCal residents.
- Assess how Southern California can help to benefit from economic relocalization/reshoring in terms of its transportation plan, equity and employment opportunities.
- Consider SCAG's role in protecting ocean resources such as kelp and whales, which are both massive carbon sinks. There is more to say here, but I'll leave it there for now.

Opportunities to reshore the economy, to minimize emissions, and to create resilience and self-reliance are major missing pieces in Connect SoCal. Targeted (or even beginning) analysis or at least a mention of trade-loss scenarios and what it might mean to transition to a more localized economy is critically important, given that the instability of supply chains will increase in the coming years. This falls squarely into SCAG's mandate to consider "discussion of regional goods movement systems, including seaports, rail, air cargo and trucking—and their relationships to industrial and retail facilities; global and national supply chains; local and national consumption; regulatory frameworks; technology transitions and community impacts." Just as SCAG is invested in land-based resources, so too should it be invested in working with government agencies to protect ocean-based resources.

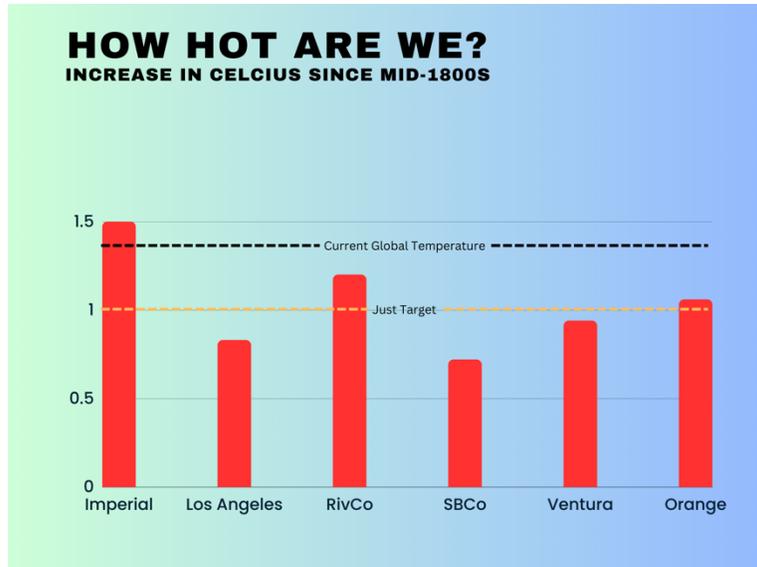
Economic reshoring is a double win because of the decrease in emissions and pollutants, that also exacerbate and/or reduce contributions and/or impacts to climate change. It's a triple win when considering associated opportunities for green, high road job creation. Automation and AI will likely facilitate economic reshoring, but SCAG should be thinking of setting guardrails around automation and AI by establishing expertise and leadership around this.

Preservation of Farmland and Open Land

I greatly appreciated reading about the importance of preserving farmland and open land for nature-based solutions to climate change and to improving equity and quality of life. The problem is that some of the goals of Connect SoCal are in conflict with one another on the ground. The plan doesn't address how these conflicting goals will be approached simultaneously without cancelling each other out. For example, prioritization of goods movement will mean continued loss of open and working lands particularly within the Inland Empire and increasingly

into the desert. Building housing also may compromise land conservation—and while the plan for infill is a clear priority in Connect SoCal, the goods movement shares no parallel plan or else it will continue to take up remaining open and working lands. As the report notes, open and working land is critical as a nature-based solution to climate change.

Imperial County is currently the center of agriculture in the region and has already reached 1.5 degrees of warming—the highest of any SCAG county. This year will likely exceed those measures. This is cause for alarm that should be noted in the document. The point is that we cannot give up on local agriculture; in fact, we need to calculate whether we can feed ourselves. As noted above, at some point we may be faced with supply chain breakdowns that compromise our food supply, as well as drought, flood, and land loss and food production problems within the central valley. In terms of projections to 2050, determining the percentage of our ability to feed ourselves through ocean and land resources should be at least mentioned in Connect SoCal.



Farmland is important to conserve because it is also an untapped resource for the production of energy through agrivoltaics.



There is a need for transparency and further data related to the role of the goods movement in the graphic “Consuming Our Resources” at left. The graphic states that 90,000 acres of natural and working lands have been lost in the past 10 years in order to “support the growth of our communities.” The “growth of our communities” implies housing, and perhaps jobs, but is misleading for several reasons. First, significant amounts of agricultural land and farmland have been lost to industrial development in addition to housing—in particular to the goods movement and warehousing. This is particularly true within the Inland Empire, where land loss has come at a fairly even split between residential and industrial uses, with

industrial uses now taking up over 60 square miles of land.

I would like to request that this statistic on land loss be broken out, by county, and between at least three land use types, including residential, industrial and commercial uses.

The statement “for the growth of our communities” is also misleading in multiple additional ways:

- Significant outsider ownership of warehousing. SoCal municipalities have ceded significant amounts of land to outsider ownership, eroding our own sense of sovereignty either between counties (overwhelming ownership of IE warehouses by OC developers) or outside of the State of California. This phenomenon also bleeds profits from warehouse heavy regions, meaning that local communities see more harm than benefit for this kind of land use
- The utilization of land to service the needs of the broader United States in addition to (and largely instead of) local SCAG counties. Your own reporting emphasizes that most of the goods that enter the ports of LA and Long Beach leave the SCAG region and the state of California. Thus, undue amounts of land are being sacrificed to a purpose that is explicitly not for our communities;
- The document rightly points out that housing is a critical piece. But industrial uses have also demolished housing—particularly in low-income communities of color within the Inland Empire. Rezoning land from residential to industrial is a clear trend and the demolition of housing is growing more common. Much of the land loss has come at a clear detriment to communities and with significant community opposition. SCAG should provide leadership to eliminate the practice of rezoning from residential and open lands to industrial and develop appropriate kinds of infill industrial development where appropriate. We have some data on this if it is of interest.

Without breaking down land loss data to the public, the public does not have a chance to comment upon this role of industrial development that takes from local populations to benefit non local populations during a time of housing crisis. Though the jobs might be said to provide community benefit, there are multiple problems with warehouse jobs, which have grown exponentially while the Inland region remains locked into cycles of low education and poverty (see Region in Crisis report).

I request that SCAG present numbers and statistics by county for land loss according to residential, commercial, and industrial categories, as the story of land loss is incomplete without them.

The Carrying Capacity of the Region for Goods Movement.

SCAG should include in Connect SoCal an analysis of the carrying capacity of the region for heavy duty trucks and warehouses that focuses on land coverage, roadway conditions, congestion, and the cost of truck-related roadway repairs. Peripherally, this could form the basis of a broader cost-benefit analysis that examines land use, light, noise, health impacts, and economy of the logistics sprawl of the goods movement sector.

The nexus of land use and transportation is well laid out in the document for housing and residential sprawl, but remains untouched regarding industrial land use and logistics sprawl, which is not looked at critically in Connect SoCal.

Industrial uses such as warehouses that benefit non-SCAG and non-California populations are taking up an increasing share of our limited resources of not just land, but energy and water. They create harms to SCAG populations in the form of GHG emissions, poor air quality, congestion, roadway and infrastructural damage, low-wage (and increasingly automated) employment, light, noise, and heat. Right now, the unstated assumption within Connect So Cal is one of unlimited growth within the goods movement sector. Please note in the document that this is a *choice* rather than a foregone conclusion. Industrial and logistics-based demand management strategies should be included and be comprised of tiered, data-driven, well-justified and clearly stated goals for *appropriate rather than unlimited* growth and or regional transformation based on the best available data.

The carrying capacity of the region should be a core part of any regional transportation plan due to the wear and tear on municipal and county roads, increased congestion, slowed emergency services due to truck-related congestion, and compromise of subterranean infrastructure such as pipes—including gas pipes that can leak and cause explosions—subterranean cables and wires, and even fiberoptics, which have all kinds of uses in monitoring environmental hazards and changes beyond their original intended use.

Analyzing the carrying capacity of the region for Heavy Duty Trucks and logistics even just on roadways is a win on many levels. It is squarely within SCAG's role to convene "local governments and agencies to address regional transportation, land use and other issues of mutual concern." Our current logistics footprint is already outsized and residents absorb the costs of road and other infrastructural repairs through taxation. This stands in contrast to the building of industrial infrastructure, which services outsider populations and is underwritten by private corporate interests. But there is no equivalent tax for roadway repair, which is inevitably needed in logistics heavy duty truck usage.

A carrying capacity study could also identify future opportunities for the trades to create union jobs, apprenticeship and pre-apprenticeship programs for subterranean roadway, pipe, and fiberoptic maintenance and repair. It could also determine the viability of widespread shifting to permeable surfacing, curb cuts and other measures that could help with water retention and percolation, the incorporation of green and/or cooling infrastructure, and also the possibility of energy producing surfaces or roadways.

One of SCAG's primary roles is to coordinate with local municipalities around land use. I understand the constraints of local government control, but also hold SCAG accountable for a one-sided view within the entire document that limits sprawl and VMT, as well as the solutions to these, to residential and commuting purposes for individuals. The goods movement has become some kind of third rail due to the significant amount of influence commercial and

industrial developers has over SCAG leadership. This deserves more critical attention in the document.

Please include a more robust engagement of the goods movement to connect the dots between transportation, infrastructural compromise and cost due to truck-related wear and tear, land use changes, equity and environmental justice, and climate change.

There is no mention of demand-management strategies related to heavy duty trucks and trade. As mentioned above, this is a missed opportunity due to the win-win of what it might mean to re-shore the economy. Relocalization efforts are increasingly supported by the federal government; thus funding will become available to support such efforts. Automation and AI will facilitate some of this movement. There is a need to project how will that change transportation planning. SCAG could lead on this in the state and nationally, which would be an exciting direction for our region, especially as a leader in global trade. SCAG could work directly with the Ports on planning such an initiative through projections into 2050.

Achieving SCAG's GHG and Emissions Reduction Targets is easiest accomplished by encouraging and incentivizing local agencies to collaborate across boundaries and think through demand management strategies. Connect SoCal does this for commuters but not for HDDT, whose significant impact makes their treatment paramount in a transportation plan.

For example, the statement that "the most significant and impactful strategies that are within the decision-making influence of the region include land use, user fees/pricing, transit/shared mobility and active transportation" needs to include responsible demand management strategies for trucks. This is the lowest cost, tech free, most expedient method of reducing emissions. SCAG could lead the state on this as well as the nation. Such an approach might give us a fighting chance at one day being able to be in attainment with our air quality and emissions reduction mandates as well as staving off the worst impacts of climate change. There are many ways this could happen and many possible approaches to such a study in the realm of sustainable development.

Electrification and Increased Heat

One last major concern that needs to be within Connect SoCal is the interlinkage between cleaner air via electrification and increased heat. This is one of the reasons why demand management strategies for goods movement are so important. Pollutants (particulate sulfur mostly) actually cause heat to decrease, because they reflect sunlight back out to space. Our goal, of course, should be to reach air quality attainment, so please do not misinterpret the following as a plea for the opposite. But warehousing in particular is something you can't have both ways. Both warehouse infrastructure and electrification increase the urban heat island effect, which causes an array of cascading problems from increased heart issues to increased heat stroke to increased energy usage via air conditioning.

You mention green infrastructure and this is most importantly deployed in two ways: both as facilities for electric vehicles and electrified trucks, but also to build out tree canopy, and urban greenspace and to preserve and conserve greenspace for the valuable and cooling resource that it is. I would like to request that SCAG note the increase in heat due to fleet and passenger vehicle proposed electrification, and to examine priorities in light of that reality. When combined with climate change, this increased heat will be a real killer.

I am counting on SCAG to be true to its mission: open, innovative, and courageous in its approach to Connect SoCal. All of the critiques made in this document are offered in the spirit of partnership and collaboration. Thank you again for the opportunity to weigh in on this plan. Please feel free to contact me if you require further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'SAP', with a stylized flourish at the end.

Susan A. Phillips
Director, Robert Redford Conservancy for Southern California Sustainability
Associate Dean, Pitzer College
Professor of Environmental Analysis
susan_phillips@pitzer.edu

Ryan Banuelos

From: 2024 PEIR
Sent: Tuesday, December 5, 2023 2:05 PM
To: 'Michael McCarthy'
Cc: ConnectSocial; 2024 PEIR
Subject: RE: Public comment on record for SCH 2022100337

Hi Michael,

Thank you for providing clarification and for your comments on the Connect SoCal 2024 Draft PEIR.

-Ryan

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Tuesday, December 5, 2023 11:26 AM
To: 2024 PEIR <ConnectSoCalPEIR@scag.ca.gov>
Cc: ConnectSocial <ConnectSoCal@scag.ca.gov>
Subject: RE: Public comment on record for SCH 2022100337

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Ryan,

Thank you for following up. I think I would prefer to phrase it differently.

After our conversation, it is now clear that there are two separate but connected commenting and planning processes – the Connect SoCal 2024 Plan and the Connect SoCal 2024 PEIR; however there is no description that there are two separate processes in the SCAG Connect SoCal landing page at <https://scag.ca.gov/connect-socal> and I remain confused as to why the layout on the left-hand side of the page and the public comment are muddled by SCAG.

- 1) why is there no description of the two separate processes at the root landing page for Connect SoCal; instead it only shows the links to the ‘Draft Plan’ comment page and process? This is confusing and potentially misleading for public comment.
- 2) The Connect SoCal 2024 Plan is not on OPR’s CEQANET project description – why not?
- 3) Are the Plan documents, public comments, public hearing comments for the Connect SoCal 2024 plan part of the administrative legal record for the Connect SoCal 2024 PEIR process?

ORG
11-3

Thank you,

Mike McCarthy

Riverside Neighbors Opposing Warehouses
92508



From: 2024 PEIR <ConnectSoCalPEIR@scag.ca.gov>
Sent: Tuesday, December 5, 2023 10:51 AM
To: Michael McCarthy <MikeM@radicalresearch.llc>
Cc: 2024 PEIR <ConnectSoCalPEIR@scag.ca.gov>; ConnectSocal <ConnectSoCal@scag.ca.gov>
Subject: RE: Public comment on record for SCH 2022100337

Hi Michael,

Thank you for the discussion we had yesterday afternoon. I left a voicemail this morning indicating I would follow up via email. We discussed your questions internally and would like to treat the questions you raised as comments on the Draft PEIR, evaluate them, and prepare a written response to be included as part of the Final PEIR. To memorialize the questions in writing, would you please confirm if the following adequately reflect the questions you had?

Why are the Plan documents not available on OPR's CEQANet website?
Are the Plan documents part of the legal public record if they are not on OPR's CEQANet website?

-Ryan



Connect SoCal 2024 Program Environmental Impact Report (PEIR)

Ryan Bañuelos, Associate Regional Planner
Tel: (213) 630-1532
banuelos@scag.ca.gov

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700, Los Angeles, CA 90017



From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Monday, December 4, 2023 12:05 PM
To: ConnectSocal <ConnectSoCal@scag.ca.gov>
Cc: 2024 PEIR <ConnectSoCalPEIR@scag.ca.gov>
Subject: RE: Public comment on record for SCH 2022100337

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Leslie,

Thank you for the response.

Yes, I am referring to the technical appendices and not the technical reports.

Under the '<https://scag.ca.gov/connect-socal-2024-read-draft-plan>' – Related Materials tab, the technical appendices are not listed but the PEIR is.

I do see now that the technical appendices are available within your attached link, but hidden from initial view without a user clicking a button to make them visible. I did not see that in previous reviews of the website as it is pretty buried from view, whether intentional or not.

Given the lack of salience, I think it is still warranted to consider extending the comment period by 15 days and making the technical appendices immediately visible on any page that displays the PEIR.

Best regards,
Mike McCarthy

From: ConnectSocial <ConnectSoCal@scag.ca.gov>
Sent: Monday, December 4, 2023 10:11 AM
To: Michael McCarthy <MikeM@radicalresearch.llc>; ConnectSocial <ConnectSoCal@scag.ca.gov>
Cc: 2024 PEIR <ConnectSoCalPEIR@scag.ca.gov>
Subject: RE: Public comment on record for SCH 2022100337

Good morning Michael,

Thank you very much for your comment – we have cc'd the 2024 PEIR team (ConnectSoCalPEIR@scag.ca.gov) to help address your comment and inquiry.

To clarify, are you referring to the 15 Technical Reports associated with the draft Plan itself, which are currently listed on the "Technical Reports" tab of the <https://scag.ca.gov/connect-socal-2024-read-draft-plan> page? Or are you referring to Appendices A-G of the Connect SoCal 2024 Draft PEIR, currently listed on the <https://scag.ca.gov/peir>?

Please do not hesitate to reach out with any additional questions.

Thank you,
Leslie



Leslie Cayton ([she/they/siya](#))
Associate Regional Planner
Planning Strategy | Planning Division
Tel: (213) 630-1453
cayton@scag.ca.gov

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700, Los Angeles, CA 90017





Register today for the [14th Annual Southern California Economic Summit](https://scag.ca.gov/economicssummit)! Join us on Dec. 7. Visit scag.ca.gov/economicssummit for more information or to register.

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Sunday, December 3, 2023 8:57 PM
To: ConnectSoCal <ConnectSoCal@scag.ca.gov>
Subject: Public comment on record for SCH 2022100337

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Report Suspicious

Dear Karen Calderon,

Please publish (or link to) the technical appendices at the Connect SoCal 2024 website (<https://scag.ca.gov/connect-social-2024-read-draft-plan>) in their entirety and consider extending the public comment period by 15 days for the deficiency in placing them on your website to date. While these materials are available on CEQANET, it was not at all apparent to me that there were technical appendices until reading over 200 pages of the PEIR document.

ORG
11-1

Thank you for your attention to this matter.

Mike McCarthy

Riverside Neighbors Opposing Warehouses
92508



Letter ORG 12

January 10, 2024

Southern California Association of Governments (SCAG)
Ms. Karen Calderon
900 Wilshire Blvd, Suite 1700
Los Angeles, California 90017
Email: connectsocialpeir@scag.ca.gov

RE: Public comment on record for the Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy); SCH 2022100337

Thank you for the opportunity to provide comments on the SCAG Connect SoCal 2024 Programmatic Environmental Impact Report (PEIR) (the Project). The Project lays out a vision for regional transportation, land-use priorities, and goods movement over the next 25 years for the six SCAG counties based on poorly substantiated planning assumptions for regional demographics and a dystopian vision of endless logistics sprawl subsidized by inland county residents.

In this letter, my comments will be on the demographic 'growth' (decline) projections used as the basis for many of the PEIR sections. The Connect SoCal plan technical report and PEIR project 11% growth to 20.8M residents (Table ES-1) in the population of the SCAG planning area by 2050. This projection is inconsistent with multiple other California state agencies which projected demographic decline; both the California Department of Finance and Caltrans projections forecast that SCAG's population peaked in 2018 and will never again be higher than ~18.9M people. Given the significant differences in demographic projections, it is necessary for SCAG to address the discrepancies in its forecast with multiple state agency forecasts and to provide reasonable planning alternatives projections that include population decline as part of its PEIR Alternatives analysis.

ORG 12-1

My comments reflect documents and datasets available including:

- Connect SoCal 2024 PEIR
- Connect SoCal 2024 Demographics and Growth Forecast Technical Report
- Connect SoCal 2020 Demographics and Growth Forecast Technical Report
- Population Projections: State of California, Department of Finance. Demographic Research Unit. State And County Population Projections 2020-2060 [computer file]. Sacramento, California. July 2023.
- State of California, Department of Finance, *E-2. California County Population Estimates and Components of Change by Year, July 1, 2020-2023*. Sacramento, California, December 2023.
- Caltrans Long-Term Socio-Economic Forecasts by County¹ - 2022 accessed November 2023
- US Census Bureau, Resident Population estimates by county – accessed November 2023 – vintage 2022²

¹ <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/data-analytics-services/transportation-economics/socioeconomic-forecasts/2022/2022-total-data/forecast-data-2022-a11y.xlsx>

² <https://www.census.gov/data/tables/time-series/demo/pepost/2020s-counties-total.html#v2022>

Population Forecast Comparison

Table ES-1 of the PEIR indicates the key summary projections of population, household, and job growth by county, as well as for the entire planning region. This is explained in some detail in both the Demographics and Growth Forecast Technical Report and in the PEIR section 3.14. On a simple level, the demographic projections are a function of births, deaths, immigration, and domestic migration. Three scenarios were examined by SCAG, with the baseline projection indicating an 11% growth in population by 2050. Higher (20+%) rates of growth are forecast in Riverside and San Bernardino County, while single digit rates of growth are forecast for Los Angeles, Orange, and Ventura Counties. Additionally, SCAG performed two sensitivity analyses to look at higher and lower rates of growth, as shown in Figure 2 of the Demographics technical report. Figure 4 in the Demographics technical report provides the projected baseline components for the four components that make up the simplified aggregate demographics forecast.

Superficially, this appears to be reasonable and robust. However, the lowest projected scenario of growth by SCAG forecasts a population of ~19.5M people; this 'lower-bound' estimate is higher than the California Department of Finance and Caltrans projections of growth by more than 1.4M people.

Table 1 shows 2050 baseline projections for SCAG, the CA Department of Finance (CA DoF) and Caltrans by county and in aggregate.

Table 1 – Population projections for the SCAG region for Connect SoCal 2024, CA DoF P-2A and Caltrans.

County	Population 2019 (Census)	Population 2050 (CA DoF P-2A)	Population 2050 (Caltrans)	Population 2050 (Connect SoCal 2024)
Los Angeles	10,012,000	8,878,000	8,739,600	10,767,000
Orange	3,171,000	3,307,000	2,785,900	3,439,000
Riverside	2,466,000	2,670,000	2,716,400	2,992,000
San Bernardino	2,177,000	2,287,000	2,296,900	2,623,000
Ventura	844,000	758,000	722,400	852,000
Imperial	180,000	192,000	174,000	210,000
Regional Total	18,850,000	18,092,000	17,435,200	20,883,000

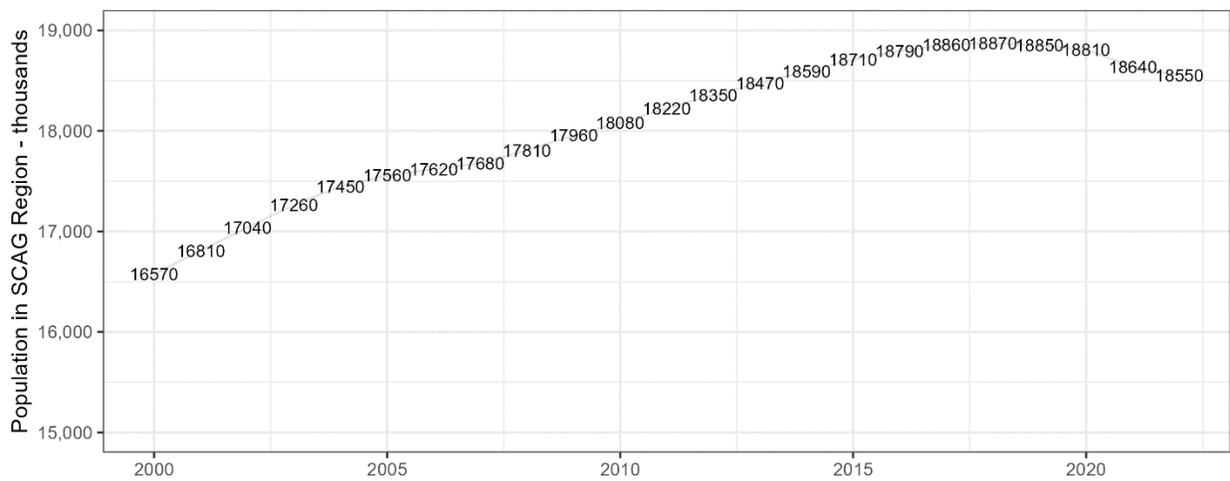
On a regional basis, CA DoF P-2A forecasts a decline of 4% to 18.1M and Caltrans forecasts a decline of 7% to 17.4M residents by 2050. Both estimates are largely due to rapidly declining population projections of Los Angeles County population to ~8.8 to 8.9M by 2050, in stark contrast to the 10.8M projection by SCAG. The difference of ~2M residents in Los Angeles accounts for most of the differences between the three projections, although there are also some other important county specific differences between projections.

It is important to remember that the adopted demographic forecast for Connect SoCal 2020 was even more optimistic, projecting a population of 22.5M by 2045 with an estimated population growth of 19% over that planning period. It has been completely wrong to date; a failure of demographic projections that leaves the SCAG RTP/SCS plan wrong-footed for adjusting its budget and planning assumptions.

Methodologically, it appears that the projections of SCAG are optimistic in three ways.

- **Birth rate** – SCAG projects birth rates to stabilize, rather than continue to decline as seen in birth rates around the developed world.
- **Foreign migration** – SCAG projects foreign immigration numbers to go up to over 100,000 residents per year, a level not seen since the turn of the century. This does not seem likely given the recent decade of immigration policy.
- **Domestic migration** – SCAG projects domestic migration out of the region to decline and to drop below -100,000 residents, which is a level not seen for the last decade.

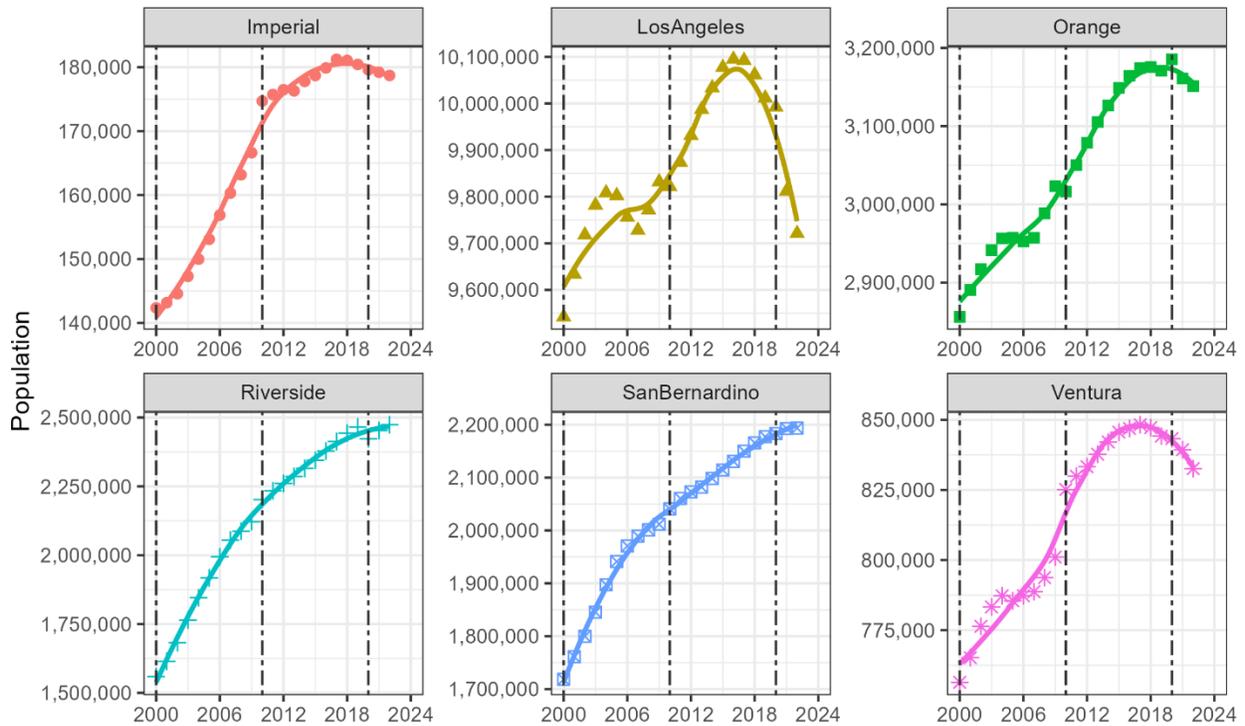
It is also notable that the SCAG technical report fails to adequately discuss or address that population declines in SCAG counties began before the COVID pandemic in 2020 and that regional population peaked in 2018 according to the US Census. **Figures 1 and 2** display the US census cumulative and county specific populations from 2000 through 2022. It is clear from both the cumulative SCAG regional plot and the individual county graphs that existing secular declines in population had started prior to the Connect SoCal 2020 plan. It is unclear why SCAG believes that the existing trends in population data from 2018 through 2023 in the region will be rapidly reversed when multiple other state agencies have publicly revised their demographic forecasts to a long-term decline in the last few years.



US Census data

Figure 1. US Census estimates of SCAG region population from 2000-2022. Population estimates for the region peaked in 2018 and declines in population began prior to the COVID pandemic.

Population trends in SCAG Counties



Source: US Census

ORG 12-1
(cont.)

Figure 2. US Census estimates of SCAG county population from 2000-2022. Declines in population in Los Angeles, Orange, Ventura, and Imperial Counties began prior to the COVID pandemic.

Lastly, the California Department of Finance released a December 2023 preliminary estimate³ for county and state populations for July 1, 2023 table E-2. In the most recently released dataset, every single SCAG county had a decline in population from 2022 to 2023. In a surprise to me, both Riverside and San Bernardino Counties had declining populations, with San Bernardino showing significant percentage declines higher than the coastal counties. San Bernardino County's population declined by a higher percentage (0.40%) than Los Angeles (0.15%) or Orange County (0.37%).

Table 1. Summary of SCAG county population change from 2022-2023 in CA Department of Finance Table P-2A, released December 19, 2023.

County	Total Population		Change 2022-2023		Components of Change					
	Revised July 1, 2022	Preliminary July 1, 2023	Number	Percent	Births	Deaths	Natural Increase	Net Migration	Net Immigration	Net Domestic Migration
Imperial	179,914	179,639	-275	-0.15	2,413	1,305	1,108	-1,383	1,454	-2,837
Los Angeles	9,840,925	9,825,708	-15,217	-0.15	93,272	72,202	21,070	-36,287	31,393	-67,680
Orange	3,154,042	3,142,277	-11,765	-0.37	30,251	23,010	7,241	-19,006	12,069	-31,075
Riverside	2,432,203	2,431,254	-949	-0.04	26,861	20,048	6,813	-7,762	4,747	-12,509
San Bernardino	2,179,263	2,170,593	-8,670	-0.40	25,734	16,538	9,196	-17,866	4,337	-22,203
Ventura	830,434	825,937	-4,497	-0.54	8,624	6,864	1,760	-6,257	1,517	-7,774

³ https://dof.ca.gov/wp-content/uploads/sites/352/2023/12/PressRelease_July2023.pdf

In combination, the data shows a clear trend – population decline in Southern California counties. None of the three forecasts of population projected declines in Riverside or San Bernardino counties until ~2040-2050 – yet it just happened in 2023. Every single county declining in population suggests an inflection where even intra-regional population transfer from the Coastal counties to the Inland counties is giving way to domestic out-migration. Differentials in cost-of-living from the Coastal counties to the Inland counties no longer provides the relief necessary to accommodate lower and middle-income households with opportunities for home ownership or prosperous employment, largely due to the singular fixation and explosive growth in goods movement land-use tearing down blocks of homes in the Inland counties to build warehouses.

ORG 12-1
(cont.)

PEIR and Policy Implications

Population projections affect the program budget, GHG emissions, AQ projections, energy, land-use and planning, households, jobs, and transportation sections of the PEIR. Additionally, the population change will have spatial implications for project planning and priority growth areas, since population decline is strongest in Los Angeles County which is the focus of a large fraction of the total SCAG priority project areas.

ORG 12-2

Given the scope of PEIR analysis that depends on population growth projections, it is critical for SCAG to address this deficiency in its analysis and include reasonable lower bounds for population growth that reflect the assumptions of demographers in other California state agencies.

CEQA Requirements

The California Office of Planning and Research website states that CEQA ‘is intended to inform government decisionmakers and the public about the potential environmental effects of proposed activities and to prevent significant, avoidable environmental damage.’ Decisionmakers and the public need to be actively informed in this planning document of a reasonable range of possible future demographic projections. Due to the critical importance of the direction of population growth or decline, and the contrarian demographic projections in the PEIR compared to other state agencies, it is necessary for SCAG to take extraordinary steps to justify its approach.

ORG 12-3

SCAG has multiple obligations to ensure that decisionmakers and the public are adequately informed.

- First, SCAG needs to update the Demographics and Growth technical report and PEIR population sections with a thorough discussion of why its projections are so much higher for Los Angeles County and the SCAG region than CA DoF and Caltrans demographic projections.
- Second, SCAG needs to substitute the average of the Caltrans and CA DoF projections as a reasonable lower bound for demographic projections for the SCAG region unless it believes those agencies are completely in error in their baseline projections. If SCAG believe that state agency projections are unreasonable, then it needs to provide a completely transparent methodological discussion and compare the year-by-year birth, death, domestic, and foreign migration numbers to state agency projections to justify its choices.
- Third, and most importantly, SCAG should include an ‘Alternatives’ analysis in Section 4 of the PEIR that compares the project impacts under a declining population scenario. This should include a discussion that addresses:
 - change in the budget

ORG 12-4

ORG 12-5

ORG 12-6

- How does budget change in absolute terms?
- How does budget allocation shift among different categories (O&M, transit, new projects)?
- How does budget allocation shift spatially?
- the changes in project lists
- how priority areas shift if population in LA county declines by 2M residents
- implications for air quality and greenhouse gases
- the relative growth rate and infrastructure maintenance cost for increasing Goods Movement under a declining population base
- implications for transit projects and locations (shift to inland empire?)
- change in land-use required if population and household is 15% lower than baseline scenario
- Change in projected transportation baseline in 2050 with significantly lower population
- Change in energy required for electrification in 2050 with lower population

ORG 12-6
(cont.)

The RTP/SCS is an important planning exercise that will direct many project and land-use decisions over the next 5 years. It is extremely important to consider the range of possible outcomes and begin to do thorough planning for the existing negative population growth observed in the region from 2018. American cities and MPOs that have failed to accurately project population declines (largely in the Midwest) have been caught in a 'doom-loop' of outsized O&M budgets that prevent new transportation projects from being funded by a declining population.

It is impossible to create a contingency plan to deal with a population doom-loop affecting long-term transportation planning if SCAG refuses to plan for the possible future of declining population. Since SCAG is the outlier projection and is relying on both CA DoF and Caltrans for its planning, it is important that SCAG account for a reasonable range of projected populations and do some thorough contingency planning in case the recent demographic trends continue to surprise to the downside.

Connection to Goods Movement

Demographic analysis is a tangent to the intent of my critique of the PEIR and its treatment of Goods Movement. Population in Southern California is declining, at least partially because of land-use and transportation planning choices that prioritize profits and pollution over people. SCAG cannot deal with the underlying issues associated with its land-use planning policies with its metaphorical head buried in the sand. Goods movement is projected to take a larger and larger fraction of the transportation infrastructure in our region, and demographic decline will accelerate this trend. Please perform a realistic planning exercise that accounts for the very real possibility that this region will never grow in population again. Project how much of our infrastructure in the Inland Empire will be devoted to trucks and freight trains in the future as population declines. Then ask yourself the question if that is a place you would be attracted to live in as a young person planning your future. A warehouse, truck, and rail dystopia is not my vision of an attractive place for future generations to choose for their homes.

ORG 12-7

Sincerely,

Mike McCarthy, PhD

Riverside Neighbors Opposing Warehouses



Letter ORG 13

January 10, 2024

Southern California Association of Governments (SCAG)
Ms. Karen Calderon
900 Wilshire Blvd, Suite 1700
Los Angeles, California 90017
Email: connectsocialpeir@scag.ca.gov

RE: Public comment on record for the Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy); SCH 2022100337

Thank you for the opportunity to provide comments on the SCAG Connect SoCal 2024 Programmatic Environmental Impact Report (PEIR) (the Project). The Project lays out a vision for regional transportation, land-use priorities, and goods movement over the next 25 years for the six SCAG counties based on a theory of 'goods movement exceptionalism' where freight movement is exempted from the policies that apply to passenger vehicles, residential housing, and transit.

I am writing this letter as a community member and environmental consultant. I am a member of Riverside Neighbors Opposing Warehouses (R-NOW), a community-based organization opposing a 4.7 million square foot warehouse project adjacent to three neighborhoods in the City of Riverside; surrounding homes with warehouses and warehouses with homes is bad land-use planning. Professionally, I have more than 20 years of experience examining near-road air pollution gradients, hazardous air pollutants, and performing health-risk assessments. I've written more than a dozen peer-reviewed articles funded by the U.S EPA, U.S. FHWA, MPOs and DOTs examining pollution from mobile sources.

ORG 13-1

The most cost-effective, technology-free way to reduce air quality and GHG emissions is to reduce the growth of the logistics sector along with your local partner agencies. Unfortunately, SCAG does not consider this as an option. SCAG pursues a business-as-usual approach to the goods movement industry providing zero policies that impact the emissions demand in this most important industrial sector.

ORG 13-2

The movement of freight (i.e., goods movement) impacts each of the non-economic policy goals of Connect SoCal 2024 negatively.

1. Air Quality - Goods movement is the most important contributor to Southern California's air quality issues.
 - a. Criteria pollutant exceedances
 - i. Ozone – nation's worst (Extreme nonattainment) with over 100 exceedances of the NAAQS annually – more than 50% of the problem is due to goods movement emissions.
 - ii. PM_{2.5} – Severe nonattainment – direct and indirect contributions to regional PM_{2.5}
 - iii. NO₂ – state nonattainment along SR-60 purely due to high truck traffic from Diamond Bar through Jurupa Valley.
 - b. Ambient inhalation cancer risk – over 60% of total cancer risk from breathing ambient air is due to exposure to diesel particulate matter from goods movement trucks,

ORG 13-3

locomotives, ocean-going vessels, cargo-handling equipment, and construction equipment for these same industries.	ORG 13-3 (cont.)
2. Housing – land use for goods movement is a nuisance to people and residential communities – warehouses, railyards, ports, and freeway infrastructure are obnoxious land-uses for residential homes, parks, schools. There is active competition for land with homes being demolished for goods movement uses despite the housing crisis.	ORG 13-4
3. Environmental Justice – The Goods Movement facilities are largely placed in lower socioeconomic neighborhoods with lower land prices among communities of color – overriding the objections of the communities living adjacent to them. Studies have shown that warehouses move into communities of color (i.e., follow socioeconomically disadvantaged communities) rather than communities of color moving in afterwards (Yuan, 2018, 2021).	ORG 13-5
4. Transportation –	
a. Goods movement competes with people movement on the same transportation infrastructure, impinging on mobility goals. This is disproportionately happening in the Inland Empire where trucks and freight trains use a higher fraction of freeways and rail than passenger vehicles or commuter rail, respectively.	ORG 13-6
b. Goods movement does more damage to infrastructure – heavier vehicles do exponentially more damage to roads and do not pay their fair share to upkeep. This requires higher operations and maintenance costs – again disproportionately impacting the Inland Empire.	
c. Congestion – goods movement facilities are sprawling farther and farther from the ports. Longer truck trips result in higher emissions, more congestion, and more GHGs.	
5. Greenhouse gas emissions - Goods movement vehicles are responsible for ~25% of GHG emissions from transportation in SoCal.	ORG 13-7
6. Goods movement land-use is incompatible with compact development.	
i. Non-walkable cities	
ii. Low-density, low-jobs warehouses	ORG 13-8
iii. Can't use alternate modes of transportation for intra-regional goods movement and drayage – requires freeways; only inter-regional goods movement uses rail.	
iv. Warehouses literally demolishing homes in the Inland Empire to make room.	
7. Goods movement (warehousing) is engaging in a pattern of leapfrog development and logistics sprawl – destroying habitat, severing connectivity, and discouraging compact development.	ORG 13-9
I ask that SCAG consider applying the policies it applies to other sectors of passenger VMT and residential growth to Goods movement to mitigate the impacts of 'logistics sprawl'.	ORG 13-10
• Please consider alternative policies that aim to reduce heavy-duty truck VMT or at least limit truck VMT growth to the rate of population growth.	
• Consider policies promoting industrial infill development in coastal counties. Logistics sprawl is pushing warehouse growth ever-further from the ports. This increases truck VMT, pollution, GHG emissions, and congestion on roads. The solution is promoting and subsidizing industrial infill and vertical warehousing nearer the ports.	ORG 13-11
• Promote environmental justice in equitable distribution of the negative externalities of goods movement – 95% of current planned warehouse footprint in the SCAG planning area are in the Inland Empire. Aim for policies of industrial infill with a target 50% of new warehouse (or infill warehouse) development to occur in coastal counties.	ORG 13-12
• Promote compact development and 'smart growth' to the Goods movement industry to combat endless logistics sprawl.	ORG 13-13

- Prioritize people movement over goods movement – prioritize passenger rail over freight movement and passenger vehicles over freight vehicles.

ORG 13-14

In this letter, my comments will be on the implications that result from SCAG’s unnamed policy of ‘goods movement exceptionalism’. My comments in this letter rely on the following datasets and sources of information.

- Connect SoCal 2024 PEIR
- Connect SoCal 2024 Appendix B – Air Quality and Health Risk Assessment
- Connect SoCal 2024 Technical Reports
 - Aviation and Airport Ground Access
 - Equity Analysis
 - Goods Movement
- SCAQMD Air Quality Management Plan (2022) - <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>
- Warehouse CITY open data product - <https://radicalresearch.shinyapps.io/WarehouseCITY/>
- Caltrans Traffic Census – Truck Traffic - <https://dot.ca.gov/programs/traffic-operations/census> and geospatial data - https://gisdata-caltrans.opendata.arcgis.com/datasets/c079bdd6a2c54aec84b6b2f7d6570f6d_0/about
- Region in Crisis – The Rationale for a Public Health State of Emergency in the Inland Empire (2023) – CCAEJ, Sierra Club - San Geronio Chapter– Robert Redford Conservancy - <https://www.ccae.org/regionincrisis>
- Multiple academic citations

ORG 13-15

Role of SCAG and Local Governments

Goods movement is a low-density, high-vehicle miles travelled (VMT) industry with negative externalities on aesthetics, air quality, biological resources, greenhouse gases, land use and planning, noise, population and housing, and transportation. It provides a variety of jobs, although the quality and payscale are highly inequitably distributed spatially throughout the region. However, there are also significant economic costs associated with the subsidized public infrastructure used by Goods movement that must be operated and maintained by local, state, and federal agencies.

Connect SoCal 2024 is an RTP/SCS plan. As part of that plan, it must consider how to meet various regulatory requirements as a partner in managing regional air quality with its partner agencies. The roles of multiple agencies are either in the space of **Emissions Control Technology** or **Emissions Demand Management**. Emissions control technology reduces pollution from individual sources. Emissions demand management regulates the magnitude of activity (e.g., truck VMT or locomotive brake horsepower per hour).

ORG 13-16

There are two pieces to every emissions inventory.

1. **Cleaner technology** – emits lower rates of polluter per unit.
2. **Emissions activity** – lower the number of units emitting pollution through emissions demand management.

Connect SoCal 2024 is negligent in its consideration of **emissions demand management** for reducing emissions of pollution in our region. Due to the severity of the problems our region is facing, we request that the report be revised to highlight these deficiencies and describe why no emissions demand

management measures are considered for the largest contributing sector to air pollution and environmental justice issues.

The 2022 AQMP from the SCAQMD describes the role of the Goods movement industry in its introductory section on p. 1-5.

Goods movement is a substantial source of smog-forming emissions in our region and the goods movement sector has recently experienced substantial growth in the region. Projections indicate that this expansion will continue. This growth has resulted in surging demand for warehousing, which has fueled the construction of new warehouses in the Inland Empire. Due to the substantial emissions associated with warehouses, it is critical that land use decisions regarding the siting of warehouses consider air quality impacts when approving new projects. While these decisions are typically made at the local level and South Coast AQMD lacks direct regulatory authority over land use, South Coast AQMD recognizes that collaboration across multiple public agencies and cities is required to promote better land use planning in consideration of air quality impacts. Figure 1-1 provides a summary of the agencies responsible for controlling growth rates and emissions standards. While South Coast AQMD is responsible for both, we are not the primary agency for demand management.



Figure 1-1. Illustration of local, state, and federal agencies and their authority over emissions control technology or emissions demand management within the South Coast Air Basin. (AQMP, 2022; reproduced from comment letter 89 – McCarthy and Phillips).

Air quality agencies are responsible for emissions control technology measures to reduce emissions from pollution sources – in the SCAG region that is the U.S. EPA, California Air Resources Board and the local air quality agencies (South Coast Air Quality Management District [AQMD], Mojave Desert AQMD, Imperial AQMD, and Ventura County Air Pollution Control District). These agencies responsible for emissions control technology have adopted many policies to reduce the impacts of emissions from goods movement emissions at the ‘tailpipe’ for trucks, cargo-handling equipment, locomotives, ocean-going vessels, and cargo aircraft. Future regulations from these agencies will continue to make new trucks, locomotives, and cargo-handling equipment cleaner through engine standards and active replacement with zero-emissions technology through 2045.

Within the SCAG planning area, emissions control technologies are actively undermined by increases in the emissions activity that SCAG and its member agencies control. Emissions activity from trucks, cargo-handling equipment, trains, planes, and ocean-going vessels involved in goods movement emissions is growing at a rate 3-5 times population growth over the last decade. In other words, truck VMT is

growing at a rate of 4 times population growth or passenger vehicle VMT. Emissions activity growing faster than the rate of population is a detriment to achieving National Ambient Air Quality Standards and is an abdication of the emission demand management authority of SCAG and its member agencies. Goods movement is being treated in a business-as-usual fashion, with no emissions management policies applied to it. This will delay attainment of the NAAQS by multiple years relative to alternative policy options of managing goods movement to grow at rates no faster than population growth.

ORG 13-16
(cont.)

For passenger vehicle VMT, this role of SCAG and local governments is recognized, and the rate of passenger vehicle VMT is projected to decline as shown in Table 3.8-12 in the PEIR. In contrast, heavy-duty truck VMT increases by 43% over the SCAG planning period – a factor of four greater than projected population growth of 11% (SCAG projections) and infinitely faster than population growth if population declines (see accompanying letter on demographics).

Logistics Sprawl

The term ‘logistics sprawl’ was coined to describe the phenomenon of the movement of logistics facilities away from urban centers (Dabanc et al., 2014; Dabanc and Ross, 2012). This phenomenon was found to be most extensive in Southern California using zip code level data from 1998 through 2009, showing a deconcentration of warehouses from the urban core (Los Angeles) towards the suburban and agricultural Inland Empire. This trend has only accelerated in the last 20 years – data from the Warehouse CITY open data product v1.17 shows that (1) over 90% of warehouse square footage developed since 2010 has been in the Inland Empire counties and (2) the barycenter of warehouse location continues to shift further from the San Pedro Bay Port complex over time.

ORG 13-17

Figure 1 shows the size weighted average location of warehouses in Southern California by decade. In 1980, the average warehouse was in Los Angeles County in relatively close proximity to the ports and the population centers of Southern California. In the current decade, the average warehouse being planned/approved and built is just east of the City of Riverside – well to the east of the highly populated coastal counties and more than 65 miles from the Ports of Los Angeles and Long Beach.

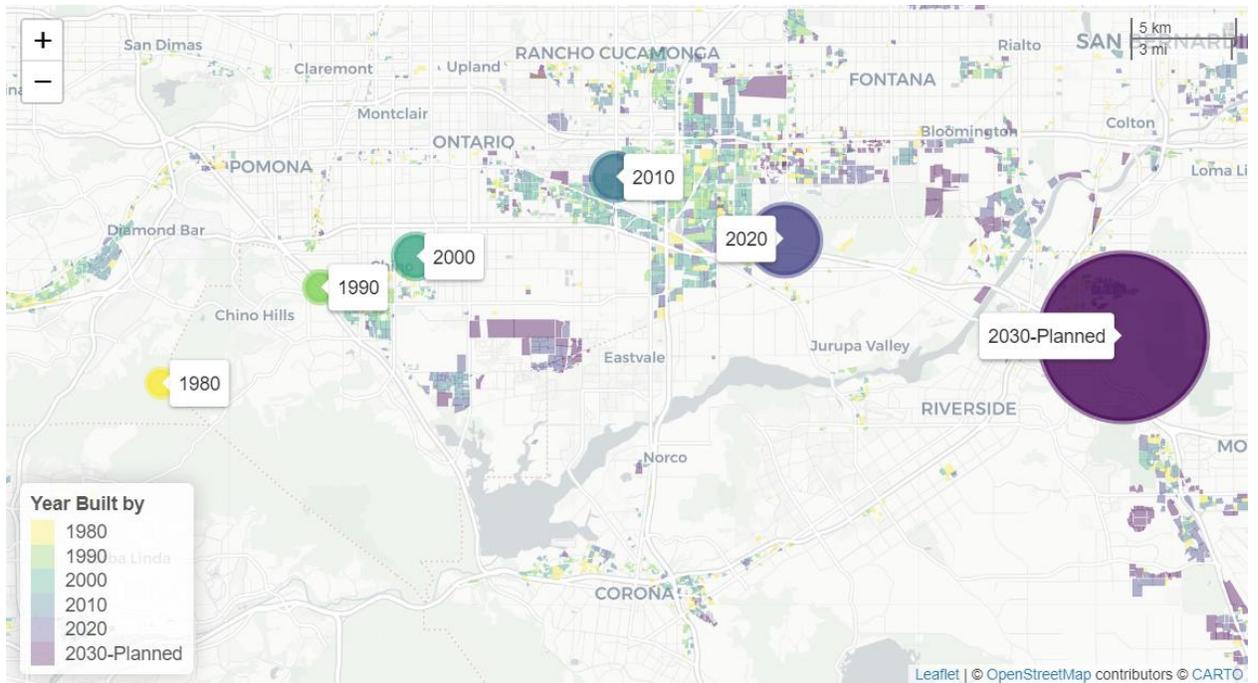
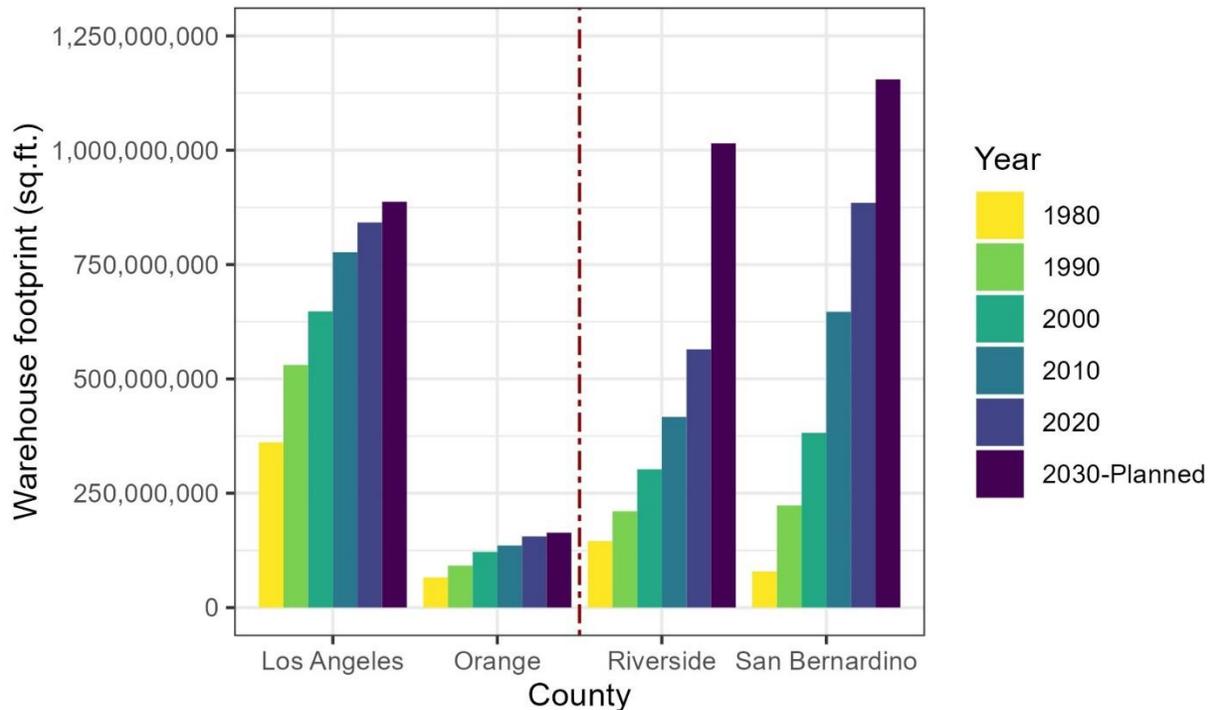


Figure 1. Size-weighted average warehouse location and relative warehouse size by decade. Warehouse locations are growing and being sited further from the ports in a pattern of unmitigated logistics sprawl.

Figure 2 shows the cumulative footprint of warehouses in the four most populated Southern California counties by decade. Patterns of growth in recent decades are almost exclusively in the Inland Empire. In the current decade, a huge influx of warehouses are being built in Riverside County through mega-warehouse complex projects like the World Logistics Center, Stoneridge Commerce Center, West Campus Upper Plateau, Beaumont Pointe, Serrano Complex, Legacy Highland Phase II project, and Sunset Crossroads.



ORG 13-17
(cont.)

Figure 2. Cumulative footprint of warehouses (and parking lots, trailers, dock doors) by county and decade in the highly populated SCAG counties. More than 95% of warehouse growth since 2010 occurred or is planned for Inland Empire counties.

The data is clear. Warehouses are getting larger, farther from the ports, and more likely to be located in the Inland Empire. The ring of warehouse growth now extends as far south as Menifee, as far east as Beaumont, and as far north as high desert cities (Palmdale, Lancaster, Victorville, Hesperia, Apple Valley, and Adelanto), or Bakersfield¹. There is almost no ‘compact development’ or ‘smart growth’ or ‘industrial infill’. SCAG has not considered a single strategy to stop the leapfrog pattern of warehouse development that leads to longer truck trips, more congestion, more road damage, and more pollution.

Stopping logistics sprawl should be a key requirement for additional warehouse development. Requiring or subsidizing vertical warehouses (multistory) and infill industrial development in coastal areas is needed to reduce the environmental impacts and distribute the externalities equitably. Instead of any mitigation, the SCAG Connect SoCal report allows business-as-usual to continue, with 95% of growth to occur in the already disproportionately impacted inland counties.

Figure 3 shows the relative annualized activity growth rates for goods movement sectors from 2018-2037 relative to car VMT, population, and GDP projections based on the 2022 AQMP – based on SCAG Connect SoCal 2020 estimates; values for the 2024 emissions activity growth rates are not substantially different. The emissions activity growth rate for goods movement sectors are 3x to 5x times the rate of population growth; this is unsustainable and undermines attainment of the ozone standard, AB32 GHG goals, and addressing environment justice issues.

¹ <https://www.latimes.com/california/story/2023-12-19/kern-county-california-warehouse-industry-next-frontier>

Growth rate by emissions sector 2018-2037

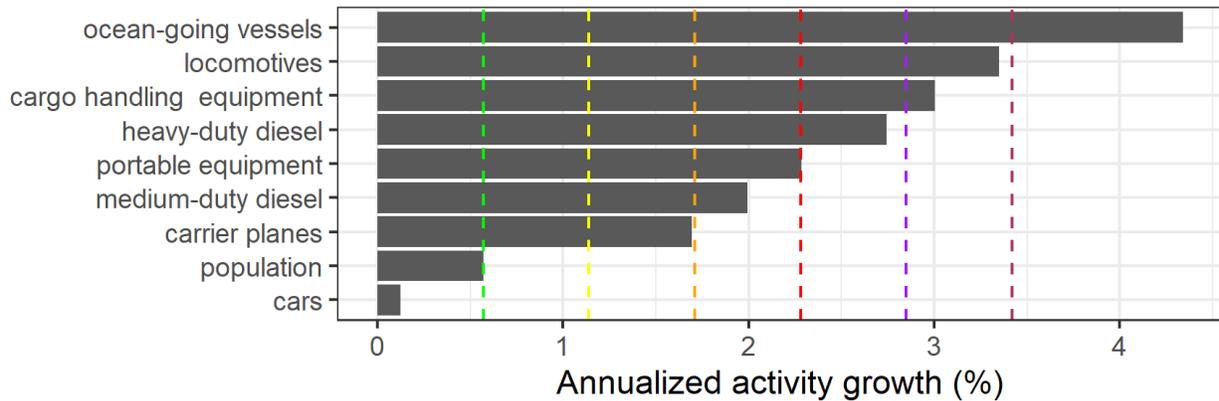


Figure 3. Growth in emissions activity rate by selected emissions sectors based on AQMP footnotes in Chapter 3 of the 2022 AQMP. Annualized values are calculated by dividing cumulative growth from 2018-2037 by 20. Data obtained from AQMP 2022 Appendix III.

ORG 13-17
(cont.)

Air Quality

Southern California has the worst ozone air quality in the United States. Goods movement is the majority contributor to the emissions of the oxides of nitrogen (NO_x) that are the limiting precursor for ozone creation. Off-road equipment, heavy-duty trucks, locomotives, and ocean-going vessels are responsible for more than 50% of NO_x emissions in the South Coast air basin. In addition, trucks cause the state nonattainment for NO₂ along SR-60 from Diamond Bar through Jurupa Valley. Lastly, inhalation cancer risk is above 200-in-a-million for almost every resident in the South Coast Air Basin as due to diesel particulate, responsible for more than 50% of all ambient inhalation cancer risk regionally.

In each of these cases, the push for zero-emissions vehicles will improve the air quality in the air basin over the next 20 years. However, in the interim, the SCAG plan will increase the activity of each of these sectors emissions activity – more cargo handling equipment, more trucks, more locomotives, more (or larger) ocean-going vessels. Each of these categories will get cleaner through the actions of SCAG partner agencies at SCAQMD, CARB, and the EPA. And SCAG will undermine the expected improvement by allowing the activity of these emissions to grow at a business-as-usual rate.

ORG 13-18

This delays attainment of the NAAQS for ozone and PM_{2.5}. Goods Movement is the largest source and increasing truck VMT, locomotive engine activity, and cargo-handling equipment will undermine our air quality. This sector needs to shoulder its share of the burden and slow its growth until zero-emissions technology achieves significant market penetration (50%). In the interim, I think restricting the growth of this sector to the rate of population growth is a reasonable proposal to allow moderate growth in this sector while allowing technology fixes to our pollution to achieve significant market penetration.

Air Quality Errata

This section contains specific technical issues with the PEIR for the Air Quality section and associated technical appendices and technical report.

ORG 13-19

- Section 3.3 – should be 3.3.1 - **Definitions** – these definitions are wildly incorrect in multiple instances. | ORG 13-19
(cont.)
 - P.3.3-1 – air dispersion is just one form of pollution transport – plumes and gravitational settling are others | ORG 13-20
 - P.3.3-1 – there are more units than just ppm and $\mu\text{g}/\text{m}^3$ – e.g., ppb, ng/m^3 , ppt are all routinely used. | ORG 13-21
 - P.3.3-1 – please format pollutant subscripts properly throughout | ORG 13-22
 - P.3.3-2 – the primary source of ozone in SoCal is off-road equipment, followed by heavy-duty trucks, then ocean-going vessels. Passenger vehicles are fifth – see SCAQMD AQMP 2022 figure ES-2. | ORG 13-23
 - P.3.2-2 – please refer to the AQMP for descriptions of pollutants and associated health effects – the descriptions in this are woefully inadequate and misrepresentative of the current state of the science | ORG 13-24
 - P.3.2-3 – TACs – please include the clean air act defined hazardous air pollutants | ORG 13-25
 - P.3.3-3 – Why is the diesel exhaust section randomly referencing New England? The best and most exhaustive list of diesel studies are from Southern California. | ORG 13-26
 - P.3.3-4 and 3.3-10 – Incorrect NAAQS values for PM_{2.5} – you are referencing the old standard – current standard is $12.0 \mu\text{g}/\text{m}^3$ as shown in your own table 3.3-4. Please check throughout as multiple errors like this occurred. Using the 2006 standard is embarrassingly bad in a regulatory document. | ORG 13-27
- Section 3.3.2 – **Environmental Setting**
 - P.3.3-5 – while the American Lung Association is a useful reference, EPA has the regulatory reference – the area is in extreme nonattainment for ozone as mentioned later on. | ORG 13-28
 - Table 3.3-2 – This is the rate of emergency department visits per 10,000 residents for asthma, not the actual rate of asthma. See: <https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf> | ORG 13-29
 - Map 3.3-1 – Why display 2015-17 when the base year is 2019 for this report? There is more recent model data available than 2017 for PM_{2.5} concentrations. | ORG 13-30
 - Map 3.3-2 – CalEnviroScreen4.0 used 2017-19 data – see its documentation. | ORG 13-31
 - P.3.3-12 – VOC, SO_x, and NO_x are not criteria pollutants. SO₂ and NO₂ are. | ORG 13-32
 - Table 3.3-7 – This table is mislabeled. NO_x emissions from SCAQMD 2022 AQMP are 350 tons of NO_x per day (Figure ES-2) for base year 2018. Please revise the title to accurately describe what you are showing or the numbers to accurately mirror the air district. | ORG 13-33
 - P.3.3-15 – These numbers for monitors are for regulatory monitors and ignore thousands of sensors and non-regulatory monitors. See, e.g., hundreds of PurpleAir monitors in the SCAG region and other types of monitors operated by citizen scientists, academics, and as special purpose monitors not shown in this figure. <https://map.purpleair.com/> | ORG 13-34
- **Section 3.3.3 Regulatory Framework**
 - P. 3.3-21 – Conformity to the SIP means that transportation activities will ‘not delay timely attainment of the NAAQS’. SCAG’s inaction and policy of business-as-usual for goods movement will delay timely attainment of the NAAQS unless the magical black-box measures in the 2022 AQMP provide extremely effective controls. Do your part SCAG. | ORG 13-35

- P. 3.3-26 - While reductions in Diesel PM and cancer risk have occurred, they are still well over the regulatory bright line of 100-in-a-million. Under a cumulative impact framework, emissions reductions that would accelerate declines in diesel PM are warranted that go beyond a merely technological control basis. Do your part SCAG. | ORG 13-36
- **Section 3.3.4 – Environmental Impacts**
 - P.3.3-34 - Given the 20 year horizon for this PEIR and the conformity requirements, a threshold of significance should be added about 'delaying timely attainment of the NAAQS'. This project will delay timely attainment. | ORG 13-37
 - P.3.3-37 – In the construction example, no baseline 2019 year scenarios are included. Why was the baseline year omitted? | ORG 13-38
 - P.3.3-41 and throughout – Lumped VMT per capita declines, but this is not the correct metric for three reasons.
 - First, the demographics are completely overestimated by ~15-20% as shown in the accompanying demographics letter.
 - Second, the VMT is lumped to include passenger vehicle VMT and truck VMT in the same category. Heavy-duty truck VMT increases by 43% - passenger VMT goes down (~2%) and the lump sum goes down per capita, but not in aggregate.
 - Third, the relative emissions for heavy-duty vehicles are much higher per vehicle, the aggregate emissions do not go down per capita as much as claimed, thus undermining timely attainment of the NAAQS and GHG targets.
 - Table 3.3-15 – SCAG provides the data for transportation planning for the SCAQMD Tables 3-2 and 3-4, thus this is a circular reference. | ORG 13-40
 - P.3.3-56 – SCAG can certainly estimate the number of ongoing construction projects – either via survey or research. Simply examining the number of construction workers would provide a baseline method for estimation. Asserting that it can't be done is false. | ORG 13-41
 - P.3.3-61 – SCAG states Connect SoCal 2024 promotes increased transportation, physical activities, and 15-minute communities, but each of these policies is undermined by goods movement, warehouses encroaching on communities, and poor air quality caused by goods movement. Inconsistent. | ORG 13-42
 - Map 3.3-5 - There is no description of the methodology, time frame or quantitative values on the scale in this map. It is extremely difficult to interpret quantitatively what claims are being made. Is this due to AB 617 Community Emissions Reductions Programs? The text and this map are methodologically unintelligible. Is Less (brown) indicating improvement or is more (green) indicating improvement? Why are so few of the improved areas in the communities with the poorest air pollution (Inland Empire?) | ORG 13-43
 - P. 3.3-70 - This methodology is absurd - an arbitrary 1 mile long chunk of freeway is not the exposure scenario for any person in the entire basin. This is air quality dispersion modeling 101 - boundary conditions and multi-source emissions matter. This arbitrarily short boundary condition that excludes all truck arterials, all background concentrations, trucks that drive an average of 30 miles, and localized sources (intermodal facilities, rail, warehouses) is a severe underestimate of real-world conditions. Moreover, the methodology excluded all the mobile source air toxic gases - acetaldehyde, formaldehyde, benzene, 1,3-butadiene; rendering the underestimate of real-world risk at least 30% too low. This is multiple steps with biased low assumptions that underestimate true cancer risk. | ORG 13-44

- Table 3.3-18 - The reported existing conditions (2019) maximum exposed individual residential cancer risk values are unvalidated values based on a limited spatial scope that does not provide an adequate indication of the actual exposures of individuals when compared to MATES V zip code average cancer risk model estimates. For example, the I-15 segment south of Temecula reports an existing Maximum EIR of 98.2, while the mean cancer risk for the zip code 92590 is 283 and for 92592 is 257 - both attribute ~72-73% of cancer risk from diesel PM. Thus, the average risk from diesel PM for all individuals in two zip codes is ~2x higher than modeled maximum value from AERMOD. This is due to ignoring background cancer risk. DPM is transportable and ubiquitous in the basin. Small segments of roadways are a subset of all possible sources within 50 km that can impact an individual. Because this exercise ignores the protocol for Air Toxics Modeling Guidance² from EPA that recommends modeling all sources within 50 km or including background, it fails to include most of the cumulative impact risk from diesel PM. This isn't isolated - 10 out of 12 SCAQMD zip codes had mean DPM risk higher than the predicted MAXIMUM risk from this inept modeling exercise. Please look at real-world DPM concentrations as measured by BC and EC concentrations at MATES V sites instead of publishing risk estimates that are - at minimum - a factor of 3 too low. See **Table 1** below for comparisons. It is important to include reasonable boundary comparisons and include sources of emissions that are cumulative impacts, rather than this garbage exercise. Do your part SCAG.

ORG 13-45

Table 1. Comparison of PEIR AQ Table 3.3-18 MEIR risk value with population weighted zip code risks from MATES V. MEIR = maximum exposed individual receptor. MATES V values show the population weighted average diesel PM cancer risk for the zip code. In almost every comparison, the 'maximum' value from the SCAG analysis is lower than the average risk for the zip code.

Segment	Location	Route	MEIR 2019	MATES V Zip code	MATES V mean DPM risk
3	LA Carson	I-110	232	90745	384
4	LA Compton	I-1710	340	90221	380
5	LA Diamond Bar	SR-60	447	91789	323
6	LA S. El Monte	SR-60	307	91733	398
7	Orange Orange	I-5	306	92868	323
8	Orange Seal Beach	I-405	567	90740	312
9	Riverside Banning	I-10	87	92220	208
10	Riverside Temecula	I-15	98	92590	208
11	Riverside Corona	SR-91	373	92880	328
12	SB Ontario	I-15	174	91730	404
14	SB Ontario	SR-60	490	91764	452

ORG 13-46

² <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=2000DWS6.PDF>

- Table 3.3-19 – SCAQMD measures NO₂ at two near-road sites and neither exceed 100 ppb. Please validate your model against real-world datasets. | ORG 13-47
- Table 3.3-20 – SCAQMD measures NO₂ at two near-road sites and only the Ontario site exceeds 30 ppb; moreover, that is the highest measured concentration in the air basin. Please validate your model results. | ORG 13-48
- P 3.3-75 – SCAG has statutory authority and responsibility to regulate on-road mobile emissions and yet this whole PEIR is a giant technocratic excuse on why it refuses to curtail diesel PM emissions using its authority through emissions demand strategy. Do your part SCAG. | ORG 13-49
- P. 3.3-76 – Sensitive land use is not defined and is used in multiple manners in this section. Please define what a ‘sensitive land use’ is in the PMM-AQ-2 definition so the mitigation measure can be evaluated. | ORG 13-50

Greenhouse Gas Emissions

The Goods Movement sections of this PEIR omit or are negligent in their consideration of the growth rate of goods movement sector GHG emissions activity. The only solutions proposed are technological. None focus on tried-and-true emission demand management measures such as infill development, reduced truck VMT, or efficiency measures. Instead, logistics sprawl and leapfrog development are the policy that SCAG pursues. | ORG 13-51

- Table 3.8-1 – Global warming potentials from IPCC AR6 released in 2021 should be used. | ORG 13-52
- P. 3.8-10 – All GHG strategies are technology based – none are emissions demand management based or land-use changes. This is insufficient and supportive of higher GHG emissions through the clear and recognized logistics sprawl throughout the SCAG region. Longer trip distances for freight results in higher GHGs, and there is no policy supporting industrial infill or reduced truck VMT per capita to reduce congestion, road maintenance, noise, and other negative externalities of goods movement. | ORG 13-53
- P. 3.8-11 - Urban heat island and extreme heat days are not given sufficient coverage, especially given the extreme temperatures in San Bernardino, Riverside, and Imperial counties. Please consider adding urban heat-island calculations or discussing CalEPA's work on this issue - <https://calepa.ca.gov/climate/urban-heat-island-index-for-california/> | ORG 13-54
- P. 3.8-51 – The project plan clearly generates excessive GHG emission for the goods movement sector when analyzed in isolation and is thus inconsistent for this sector. Hiding those emissions among passenger VMT reductions is not reasonable. SCAG do your part. | ORG 13-55
- Table 3.3-7 - Goods Movement Exceptionalism on full display - rail and ocean-going vessels omitted from emissions inventory as if they aren't invited into the basin via port, goods movement policies, and warehouse land-use policies. SCAG do your part. | ORG 13-56
- Table 3.3-8 - estimates of CO₂ from rail are available from CARB GHG emission inventory tool and should be included and projected forward as part of RTP analysis; rail is a significant GHG contributor nationally and locally, especially for projected goods movement emissions growth. | ORG 13-57
- Table 3.8-12 – This is ridiculous. VMT per capita details need to be provided for Trucks (heavy duty VMT). See **Table 2** for the proper accounting of VMT that identifies the unrestrained growth and devotion of infrastructure to the trucking industry. SCAG’s omission of emissions demand management control is anti-people and omits the greater emissions of truck GHGs per mile traveled (~2.4 lbs CO₂ vs. ~0.8 lbs CO₂), thus increasing GHG emissions over the intervening time period, despite the lower total VMT, because of the shifting fleet composition to trucks. | ORG 13-58

Table 2. Revised version of Table 3.8-12 to include tabulated breakout of Truck VMT to display the unrestrained growth in goods movement planned by SCAG from 2019-2050 as part of its own transportation planning.

	Year 2019	Year 2050	Yr 2050 vs 2019
Population	18827000	20882000	10.9
LD VMT	413969000	407065000	-1.7
Total VMT	444240000	450428000	1.4
LD VMT per Capita	21.99	19.49	-11.4
VMT per capita	23.6	21.57	-8.6
Non-LD VMT	30271000	43363000	43.2
Truck VMT per capita	1.61	2.08	29.2
Truck %	6.81	9.63	41.3

ORG 13-58
(cont.)

Environmental Justice

The Connect SoCal 2024 PEIR includes no specific section on Environmental Justice, despite the long-standing and widespread issues of environmental justice. This is problematic for multiple reasons.

California state law 65040.12(e) defines the term environmental justice as *'the fair treatment and meaningful involvement of all people regardless of race, color, culture, national origin, income, and educational levels with respect to the development, implementation, and enforcement of protective environmental laws, regulations, and policies.'*

The Connect SoCal 2024 PEIR does not reflect the meaningful involvement of communities disproportionately impacted by its impacts in the crafting of this project. Specifically, this PEIR omits any mention of the community activism and opposition to the land-use and transportation policies siting warehouses in Inland Empire communities as reflect in the January 2023 *Region in Crisis* report³ describing the impacts of goods movement facilities on our communities. I sent letters, participated in listening sessions, and public comment sessions and none of my concerns are reflected in this PEIR or Connect SoCal 2024 plan.

ORG 13-59

There are multiple community-based organizations formed and organized in the last five years specifically to fight warehouse and goods movement projects in Southern California. I am part of Riverside Neighbors Opposing Warehouses (R-NOW). Others include the Pass Action Group in Banning, the South Fontana Concerned Citizens Coalition (SFCCC), Bloomington Concerned Citizens, The People's Collective for Environmental Justice, San Bernardino Airport Communities, Just SB, and Lakes at Hemet West, Ontario for Agriculture. These are new additions to the longstanding opposition of groups like Sierra Club San Gorgonio Chapter – Moreno Valley Group and Centers for Community Action and

³ <https://www.ccaej.org/regionincrisis>

Environmental Justice (CCAIE); together these two groups successfully blocked warehouse projects in Moreno Valley in 2023 through litigation. These community groups are calling for a warehouse moratorium, warehouse setbacks such as proposed in AB 1000, and other measures to prevent warehouse encroachment on existing communities; not merely token engagement activities like SCAG pursues. SCAG’s Goods Movement Technical Report mentions partnerships with industry and big business on its page 1 – indicating the priority of its partners in developing this policy of goods movement exceptionalism.

Connect SoCal 2024 is an example of a ‘Decide, Announce, Defend’ process with no actual community engagement with community groups on the ground fighting the policies that SCAG promotes. Diesel PM, ozone, and goods movement facilities are disproportionately located in Inland Empire communities of color. This PEIR does nothing to address that fundamental disparity. Community engagement was an empty ritual that had no impact on the final PEIR or its exemptions for Goods Movement activities. SCAG provides a ‘toolbox’ for environmental justice and a few empty words on how it engages in environmental justice while failing to actually take any meaningful actions or policies to reduce impacts as it has the regulatory power to do.

Figure 4 shows the overlay of CalEnviroScreen4.0 scored quantiles with warehouses locations. There is a significant confluence between warehouse mega-clusters and disproportionately impacted communities.

ORG 13-59
(cont.)

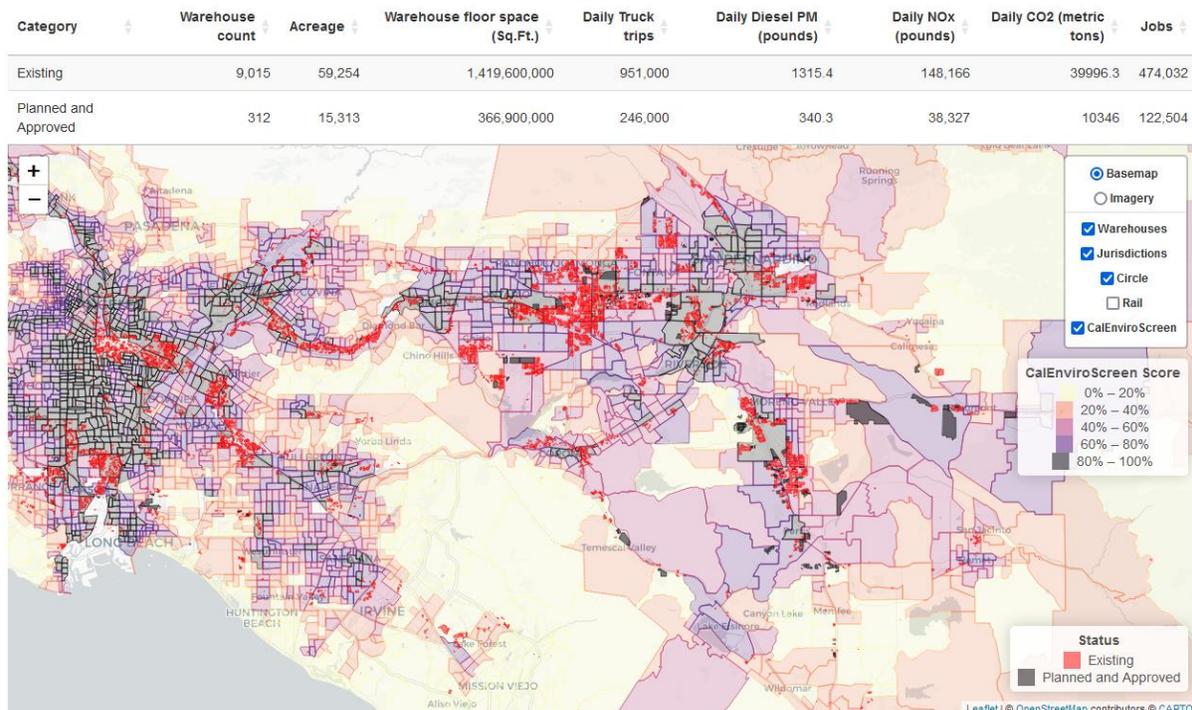


Figure 4. Warehouse locations overlaid with areas of CalEnviroScreen4.0 disproportionately impacted areas.

The purpose of CEQA is to (1) inform the public and decisionmakers of all potential environmental impacts of proposed discretionary projects and (2) to mitigate or eliminate significant environmental effects of public agency decisions. I do not believe that the draft PEIR can be considered a credible

document when it entirely omits any discussion of environmental justice and the need to mitigate the cumulative environmental impacts of thousands of warehouses adjacent to vulnerable communities.

Therefore, I ask SCAG to justify its omission of Environmental Justice concerns of the community regarding goods movement from this draft PEIR. In addition, I ask for an analysis of the impacts of the cumulative projects within the SCAG on these census tracts to be evaluated and disclosed to the public as part of the PEIR process. Finally, I ask that any project impacts that will disproportionately impact residents of SB 535 communities be involved in discussions around the most impactful mitigation measures that can be done to reduce the impacts of the encroaching warehouses and goods movement facilities on their communities.

ORG 13-59
(cont.)

Alternatives Analysis

There are two alternatives analyses that should be performed as part of the PEIR to meet CEQA requirements to inform the public and decisionmakers of all potential environmental impacts and to mitigate or eliminate significant environmental impacts of public agency decisions.

- 1) Demographics Analysis – As described in the accompanying demographics letter, the demographic projects in the PEIR are extraordinarily optimistic and inconsistent with the declining population projects by other state agencies (California Department of Finance and Caltrans). It is important to do reasonable contingency planning for a stagnant and/or declining population future, even if it isn't considered most likely. Please perform a thorough alternatives analysis with either of those projections of population.
- 2) Goods Movement Restricted to Population Growth – As described throughout, Goods Movement activity grows at 3-5X population growth under the optimistic population growth scenario. This appears to be a deliberate policy of exempting the Goods Movement from the emissions demand management policies applied to housing, passenger VMT, and mobility, and 15-minute city goals. Logistics Sprawl is inconsistent with this and yet no policies appear to be applied to Goods Movement. Therefore, I ask for an alternatives analysis that examined whether any significant and unavoidable impacts could be avoided by applying the policies of reducing VMT, infill development, and compact growth to the Goods Movement industry.

ORG 13-60

Summary

Connect SoCal 2024 is an extremely important planning document that sets the stage for nearly 750 billion dollars of transportation infrastructure. Unfortunately, this plan encourages the goods movement sector related emissions activity to grow by a factor of 3X and 6X greater than population growth. The goods movement sector emissions activity growth in Connect SoCal 2024 is an abdication of local regional and local municipality accountability for **emissions-demand management**. The SCAG is the relevant authority to choose to pursue and lead on a policy of emissions-demand management for the goods movement sector, along with its partner air quality agencies and the local municipalities that make land-use planning decisions.

ORG 13-61

In conclusion, the most cost-effective, technology-free way to reduce emissions is to reduce the growth of the logistics sector along with your local-partner agencies. This requires a focus on local actions that can be taken by SCAG and collectively by local municipalities, and that requires SCAG leadership. The SCAG should provide leadership and coordination that will allow the region to limit

exponential demand-driven growth that predominantly harms communities alongside goods movement corridors, and that will delay attainment of air quality standards for the entire region. Our communities deserve better and are paying the price and people are fleeing the state. Prioritize people over industry in agency planning.

ORG 13-61
(cont.)

Sincerely,

Mike McCarthy, PhD
Riverside Neighbors Opposing Warehouses
92508



Resume - <http://radicalresearch.llc/resume.html>
Selected Publications - <http://radicalresearch.llc/pubs.html>

Errata

- Map ES-4 – March ARB Boundaries reflect 1996 year active base boundaries and not post BRAC active base boundaries. The March JPA planning area is an industrial park for ~1800 acres of the displayed map. Please revise. | ORG 13-62
- Map ES-5 – The relative ratios of priority development areas by county are not consistent with the projected growth in absolute or relative population. It is unclear why San Bernardino and Riverside County has so few priority development areas (land area basis) relative to LA County or Orange County despite having far higher projected relative population growth. | ORG 13-63
- Map ES-6 - Same basic comments for transit priority areas and neighborhood mobility areas - the fraction of the land-area in inland counties with these designations is proportionally lower than their expected growth rates and current population density. Is there spatial inequity in the allocation of these areas? Additionally, how are these priority areas affected if population growth rates are CA DoF Table P-2A instead of SCAG rose-colored glasses? | ORG 13-64
- P. ES-13 – botched citation | ORG 13-65
- Aviation technical report
 - Table 5 – Please include SBD and RIV to identify truck counts due to their high cargo counts and cumulative pollution impacts.
 - Figure 14 – SCAG has at least 30% more air cargo (and associated emissions, noise) than any other major metropolitan areas | ORG 13-66
 - Figure 20 – 300,000 tons of monthly air cargo – again, we are choosing to emit more pollution than any other region due to our overreliance on goods movement.
 - Page 55 – Is AQMD also doing an MOU with SBD and other cargo airports?
 - Table 7 – Growth rates in truck trips to ONT and LAX are 5.6% and 2.6% per year – multiple times higher than population growth rate. Please include this in alternatives analysis emissions demand management. | ORG 13-67

- Overall – no analysis of noise for cargo airports (SBD, RIV, SCS) – goods movement exceptionalism again | ORG 13-68
- Land use section of PEIR
 - P. 3.11-3 – The SCAG region serves as the nation’s gateway for global trade is a heckuva opener for a region with 19M people’s land-use priority. That shows the bias inherent in your whole PEIR. | ORG 13-69
 - P. 3.11-7 – Compact development and smart growth are not applied to the goods movement industry? Why are they applied to residential growth but not warehouse growth? | ORG 13-70
 - Map 3.11-1 – This map is grossly inaccurate and out-of-date.
 - Wrong base year – the base planning year is 2019 – not 2016.
 - March JPA planning area is ~4400 acres of industrial and ~2,000 acres of military installation.
 - This should show the 2019 land use designations which would be markedly different for Inland Empire communities due to the explosion in industrial warehousing land-uses between 2016 and 2019 (and subsequent years).
 - As an example, it shows a huge swath of agricultural land between Moreno Valley and Perris south of the March ARB where that is all Industrial warehouses – 50M square feet of them.
 - Same story for South Ontario which just finished construction of the South Ontario Logistics Center, a 4M SQ FT warehouse – largest in the country.
 - Please revise this map to show 2019 general plan land use designations that are accurate. | ORG 13-71
- Population, Land Use, and Housing section of PEIR
 - Table 3.14-3 – OC household size in 2019 is not 1.29 – typo? | ORG 13-72
 - P 3.14-5 – EJ equity analysis should be in the PEIR as a full EJ section, not merely a technical report in the plan outside of CEQA. | ORG 13-73
 - Table 3.14-7 - Unemployment rates for the region need to be population weighted - SCAG regional unemployment rate is largely based on LA county. Please revise the table and text. | ORG 13-74
 - Table 3.14-8; 9; 10 – Population, Household, and Employment projections for the SCAG region are far higher than CA DoF or Caltrans projections for the same time period - largely driven by Los Angeles County. Please explain and include state agency projections as lower bound estimates. | ORG 13-75
 - P.3.14-12 – The scoping plan discusses the ‘legacy of transportation and land use decision making that has resulted in marginalization of low-income communities and communities of color...’ This is ONGOING through Goods Movement Exceptionalism. SCAG needs to take a long hard look in the mirror. | ORG 13-76
 - P 3.14-12 – That the Appendix E of the scoping plan that is discussed for Sustainable and Equitable Communities only applies to ‘residential and commercial development’ is yet another example of the Goods Movement Exemption. Trucks don’t have to cut their VMT just the peasants that live here. | ORG 13-77
 - P. 3.14-20 – The second threshold of significance ‘displace substantial numbers of existing people or housing’ is happening all over the Inland Empire. Dozens of warehouse projects are buying residential homes, demolishing them, and replacing them with the warehouse projects. Bloomington Business Park is actively demolishing 190 homes and an elementary school to replace them with 4 warehouses. The Airport | ORG 13-78

Gateway Specific Plan proposed to demolish over 1,000 homes before the Attorney General stepped in along with many environmental justice communities. SCAG needs to stop endorsing rezoning residential for industrial throughout the Inland Empire in the midst of a housing crisis.	ORG 13-78 (cont.)
○ P.3.14-26 – The displacement of residential for industrial is anecdotally significant in the Inland Empire and it is due to SCAG pushing goods movement.	ORG 13-79
○ Map 3.14-2 - The planned growth map is exceptionally inconsistent with the State agency projections of population decline for LA County. The population is projected to decline in LA county by over 2M residents compared to this plan. Please compare projections and address that SCAG's projections are very inconsistent with state planning agencies.	ORG 13-80
○ Map 3.14-3 - Unincorporated county job growth appears to be excluded in this map. Please clarify that the title of jurisdiction only applies to cities and excludes JPAs, and census designated places with extensive projected job growth (e.g., MJPA planning area, Mead Valley, Bloomington, Fontana sphere of Influence, Temescal Canyon, Beaumont sphere of influence); This map is a drastic underestimate for inland counties with significant growth in unincorporated communities.	ORG 13-81
○ Transportation – my estimates of the 43% growth in truck traffic while passenger vehicle declines would suggest that Inland Empire highways will have average truck traffic percentages of 16% in 2050, up from a current value of 11-12%. FHWA considers a major freight corridor any highway with greater than 8,500 trucks per day. Almost every freeway in the Inland Empire exceeds that number of trucks as an existing condition, and the plan decreases the relative ratio of passenger vehicles on those freeways only for trucks to replace them.	ORG 13-82
○ Safety – a recently released report on truck safety indicates that fatalities associated with trucks has increased over the past five years (2017-2021) such that 13% of traffic fatalities involve a heavy truck, killing the occupants of the non-truck vehicle ~83% of the time. Fatalities increased from ~4,900 in 2017 to ~5,800 in 2021. ⁴ Increasing goods movement truck VMT will result in more fatalities in Southern California, a significant and unavoidable impact.	ORG 13-83
● Goods Movement Technical Report	
○ P.1 – no community engagement, no discussion of EJ communities, only discussions of partnerships with industry and government big money programs	
○ P.2 – goods movement is essential but the proposed growth rates are unsustainable and contrary to the people living in these communities	
○ P.4 – this section conflates goods movement as primarily serving local business and residents – the majority of goods movement is pass through to other parts of the country, not local.	
○ P. 7 – Figure of retail sales – what do national retail sales have to do with local goods movement growth rates? Please state your assertions and assumptions.	
○ P. 10 – Construction, retail, and manufacturing are NOT goods movement jobs or economic categories. Economists at the SCAG IEEP only include the warehousing and transportation and wholesale categories in goods movement. Other categories are indirect, at best.	

⁴ https://tripnet.org/wp-content/uploads/2023/12/TRIP_Freight_Report_December_2023.pdf

- P. 13 – Square footage is a massive underestimate compared to WarehouseCITY v.1.17 numbers – about 50% of the actual values estimated using other methods and other figures within this report (e.g., Figure 7 vs. Figure 11)
- P. 25 – Rail is better for greenhouse gas emissions but is not better for air quality unless emissions controls are applied to locomotives to keep up with zero emissions vehicles for trucks.
- P. 28 – SR-60 is asserted to be within 5 miles of 50% of warehouse space in region, but this is demonstrably false.
- Figure 17 – Primary cargo airports in the region are not all passenger airports (SBD, RIV, SCS) are all key cargo airports that should be shown.
- Figure 18 – Please include SBD and RIV as important regional cargo airports
- P. 37 – Again fails to consider the option to reduce goods movement growth, which would be the least expensive way to reduce emissions growth.
- P. 36-38 – This whole section is a great example of regulatory capture. Stop mansplaining on how beneficial this industry is. Do your part SCAG.
- P. 52 – Approximately 55% of warehouses are currently out of compliance with warehouse ISR and no emissions demand management policies have been considered or described – this is the key regulatory option SCAG has!
- P. 57 – Focusing solely on the economic benefits of goods movement in a community engagement study is perverse and a model of bad community engagement.
- P. 73 – Automation – Driverless trucks and automated warehouses undermine all the jobs and economic benefits described in the rest of this technical report. Why devote 15% of our land to an industry that won't employ local people in 20 years?
- P. 78-79 Automation – Why devote such a large share of our transportation infrastructure to an industry that is shedding jobs and automating its land-use? That is subsidizing an industry that provides no local economic value and has huge infrastructure costs that are borne by residents.
- Table 7 – Diesel vehicles will continue to be on the road from 2025-2042 time frame – reducing growth rates and Truck VMT in goods movement industry will have immediate benefits.
- Maps 3 and 4 are inconsistent in showing freight corridors.
- Figure 39 – These numbers do not match the CA EDD employment numbers for warehousing and transportation and significantly underestimate total employment in this sector (~440,000 as of 2022).
- Table 14 – The proportion of truck trip VMT in Los Angeles County (55% of total in Table 14) is inconsistent with multiple other data sources that are proxies for truck trips
 - Relative area of warehouse space in the Inland Empire counties vs Los Angeles County (about 30% of warehouse area is in Los Angeles County)
 - Diesel sales volumes report by counties in the state reported to California Energy Commission (CEC-A15)⁵ - ~35% of diesel sales in LA County vs 50% in IE counties.
 - Truck volumes reported by Caltrans on highways⁶ – volume weighted AADT is 55% Los Angeles County, but volume weighted truck AADT (not adjusted for route length) is 41% Los Angeles County.

⁵ <https://www.energy.ca.gov/sites/default/files/2023-08/2010-2022%20CEC-A15%20Results%20and%20Analysis%20ADA.xlsx>

⁶ https://gisdata-caltrans.opendata.arcgis.com/datasets/c079bdd6a2c54aec84b6b2f7d6570f6d_0/about

- Trucking employment numbers by county from CA EDD indicate that the truck transportation employment in LA county (40,000) vs Inland Empire Counties (34,400) is not consistent with a truck volume being 55% in Los Angeles County.



January 12, 2024

Letter ORG 14

Southern California Association of Governments
Attn: Ms. Karen Calderon
900 Wilshire Blvd., Suite 1700
Los Angeles, CA 90017

via electronic mail at: ConnectSoCalPEIR@scag.ca.gov

Re: The Business Coalition’s Comments on the Draft Connect SoCal 2024 Plan (Regional Transportation Plan/Sustainable Communities Strategy) and the accompanying Program Environmental Impact Report

Dear Ms. Calderon and the Connect SoCal Team:

On behalf of the Southern California Business Coalition (“Business Coalition”) and its members that are signatories to this letter, we appreciate this opportunity to both comment on the Draft 2024 Regional Transportation Plan/Sustainable Communities Strategy (“Connect SoCal 2024,” “RTP/SCS,” or the “Draft Plan”) and accompanying program environmental impact report (the “PEIR”), and express our thanks to you and your staff for your collaborative and forthcoming approach to the drafting of these documents. We appreciate that SCAG’s executive leadership and staff have provided our members with many occasions on which to ask questions during the RTP/SCS development process, and to provide our comments and suggestions along the way.

ORG 14-1

On July 18, 2023, the Business Coalition provided SCAG's leadership and its Connect SoCal 2024 team with a copy of the policy principles we developed for our use when reviewing and evaluating the Draft Plan. These included:

- **Accounts for Technological and Societal Change** – that Connect SoCal 2024 should account for the benefits of all recent technological and societal changes, such as ongoing increases in the number of people who work from home, in developing and calculating its GHG and VMT reduction strategies;
- **Supports Housing Production** – that Connect SoCal 2024 supports the accelerated production of new housing to address the housing crisis, in compliance with recent reforms to state housing laws. Also, Connect SoCal 2024 must be crafted to avoid problems associated with CEQA abuse and so as to assure that projects, to the extent possible, enjoy the benefits of CEQA exemptions and streamlining;
- **Respects Local Control** – that Connect SoCal 2024 respects local control by giving cities, counties and local transportation agencies appropriate control and flexibility in matters related to land use and transportation;
- **Provides Positive Economic Impacts** – that Connect SoCal 2024 supports economic growth, encourages job creation and that the Plan include a true cost/benefit analysis that delineates the plan's positive economic outcomes for the region;
- **Applies Appropriate Criteria for New Revenue Sources** – that Connect SoCal 2024 ensures that new transportation revenue sources are fair, equitable and economically sound, so that new revenues are drawn fairly and proportionally from those who would benefit from the related transportation infrastructure or improvement; and
- **Assures Transparency and Disclosure** – that SCAG commits to transparency and disclosure in the drafting, development, and public review of the Draft Plan.

In the same letter, we requested that SCAG prepare and share the results of modeling of a land use scenario that reflects the realization of the local governments' respective housing elements that are approved, or are pending approval, and reflect the local governments' planning to accommodate the sixth cycle RHNA process. Although we understand that such modeling was not undertaken, we appreciate that Connect SoCal 2024 modeling does indeed accommodate the 1,341,827 housing units which were required by the current sixth cycle of RHNA.

We are pleased that the Draft Plan largely addresses our policy principles noted above and has resolved most of the concerns that we raised in our meetings with SCAG's executive leadership and staff during the Plan development process. We therefore write today to express our general support for the

Connect SoCal 2024 draft plan, provided that some remaining matters expressed in this letter are satisfactorily addressed in the Final Draft, in the accompanying PEIR as needed, and in SCAG's planning efforts going forward.

ORG 14-1
(cont.)

First, we wish to express our appreciation and support for certain elements of the Draft Plan which demonstrate SCAG's efforts to assure that Connect SoCal 2024 will provide tangible economic benefits to the region. Most importantly, we wish to express, as representatives of businesses that are vital to the regional economy, our support for the extensive transportation improvements that are envisioned in the RTP/SCS, which will total a cumulative investment of \$750 billion over the duration of Connect SoCal 2024's term. Our region's transportation network and the aging infrastructure that underpins it are essential to our regional economy. Every constituent and all persons in the SCAG region are dependent on our transportation infrastructure. For the region to become more livable, prosperous, and accessible, transportation investments of the scale indicated in the RTP/SCS are indeed necessary.

We also wish to express our specific support for the following two transportation-related aspects of the Draft Plan:

- **Goods Movement:** The importance of the Goods Movement & Transportation ("GM&T") sector to Southern California's economy – not to mention the state and national economies – cannot be overstated. The San Pedro Bay Ports handle goods valued at \$1.37 billion a day (\$500 billion annually), and there are more than 307,000 trade-related jobs in Los Angeles County alone. More than any other sector in the region, GM&T creates more high-wage jobs for people who do not have a college education, and as such has provided a path for thousands upon thousands of Southern Californians to achieve long-term financial security.¹ We therefore appreciate that the Draft Plan includes \$65 billion in capital expenditures for goods movement projects. Moving forward, we encourage SCAG to pursue pragmatic pathways to keep the Region competitive by meeting the goods movement sector's infrastructure and energy needs in light of State mandates for GHG reductions and the conversion of both fixed and mobile sources to cleaner energy options. We encourage SCAG to lead a regional initiative to research, communicate, and implement policies that will increase a better understanding of the economic importance of our ports and the entire goods movement sector to our region, state, and nation. We look forward to working with SCAG to create opportunities for regionwide communication, coordination, and understanding between businesses, utilities, regulatory agencies and regional planning agencies to better prioritize projects, secure sufficient funding, and increase system-wide integration and efficiencies in support of improved goods movement.
- **Express Lanes:** We appreciate that the Draft Plan commits to the planning, permitting, funding and building of additional express lanes throughout the region. Express lanes can be effective in

¹ The average salary of Los Angeles County trade-related employees is \$73,106 [LAEDC 2020], with the average annual salary of jobs at the ports in the \$117,000 to \$139,000 range, approximately double the overall Los Angeles County average wage for all workers of \$68,900.

the management of travel demand by alleviating congestion and encouraging ridesharing, which helps to reduce GHG emissions. As nearly all future highway expansion projects in the SCAG region will involve the provision of new express lane capacity, one of the most essential roles for SCAG and its member jurisdictions will be to develop a coordinated and strategic approach for the buildout of the region's express lane network. This is particularly important because the response to Senate Bill 743 implementation is still evolving,

Beyond the sections of the Draft Plan directly related to transportation projects, we also support the following elements of the draft:

- **Housing:** As noted above, we appreciate that the Draft Plan addresses and accommodates the sixth cycle RHNA requirement of 1.34 million new housing units in the region and includes SCAG's own goal of 1.6 million new housing units regionwide by the horizon year of the plan. We appreciate the various policies and strategies in the Draft Plan that can support greater regional housing production; but, as explained below, we urge SCAG to assume more of a leadership role in efforts to identify and champion development opportunities beyond existing urbanized areas, to include master-planned new towns, new so-called edge communities, and their related infrastructure. We fear that the Draft Plan assumes too much growth within the centers of urbanized areas and around particular transit nodes, which will provide far too limited opportunities for new development, especially affordable new development; and this will in turn constitute a major impediment to meeting the RHNA and SCAG's targets for new housing production. The highly constrained growth pattern that is inherent in the Draft Plan will, if it is not revisited and reasonably relaxed, lead to a continuing and severe shortage of available and affordable housing. The SCAG region will not have the amount of additional housing supply needed to solve the housing affordability crisis unless a larger palette of development opportunities can be realized – one that includes a more balanced typology of new development in addition to redevelopment. As is noted in the Draft Plan (on page 21 of the Economic Impact Analysis technical report), if housing production is not increased, the region's economy will suffer.

That said, we appreciate the inclusion of the Housing Technical Report, which provides a good summary of the region's housing challenges and highlights the connectivity between resolution of the housing crisis and sound regional transportation planning. We also appreciate that the Plan anticipates that the region will leverage \$6 billion for critical housing-supportive infrastructure, like water, sewer and electrical utilities, which is essential to spurring housing development across the region. We support both this approach and additional efforts to assure local government has the resources, funding, and flexibility that they need to meet the growing demand for infrastructure maintenance and expansion, as is needed to support and enable housing.

- **Workforce Development and Technology:** We appreciate the discussion in Chapter Two of the Draft Plan regarding changes to the future of the workplace and SCAG's assumptions regarding continuing increases in telework rates. SCAG must continue to track these trends and incorporate them into their modeling and analysis, because they should cause changes to the assumptions used in modelling VMT for new housing, and the levels of transportation-related GHG emissions. We stated in the policy principles noted above that Connect SoCal 2024 should support economic development and job creation. Accordingly, we appreciate the inclusion of the workforce development policies, and in particular recognition of the need to foster a resilient workforce, especially given the positive cost/benefit analysis and job creation projections that are reflected in the Draft Plan.

Whereas we applaud the Draft Plan as expressed above, the Business Coalition nonetheless has remaining areas of concern, which we believe should be addressed through SCAG's ongoing planning efforts. Specifically, we see the need to better address the following areas of concern:

- **The Need for More Effective Approaches to Increased Housing Production:** Simply put, the SCAG region needs a staggering amount of new housing supply added within a short period of time, and we are concerned that the Draft Plan's emphasis on overly-concentrated, transit-oriented and urban-centric infill development will not lead to the amount of housing that is needed, especially affordable housing, if it is not reasonably expanded. SCAG, as the region's planning hub, should strive to make it easier to meet housing supply goals by removing barriers to the development of new towns and master-planned communities, particularly in unincorporated areas of the six counties in the region, where land is available and can be improved more economically when compared to building predominantly in urban centers and near public transit routes. Consequently, we encourage SCAG to undertake a greater leadership role in seeking a better balance between transit-oriented and urban development and, in addition, new development outside of existing urban boundaries. For example, the Draft Plan indicates a projected limitation on such development through 2050 to just 40 square miles throughout the entire 1.8-million-square-mile SCAG region, as stated in the performance measurement tables in Section Five of the Draft Plan. We view this limitation as wildly unrealistic and restrictive, given the economics of housing production, the challenges relating to adding infrastructure, and especially the current massive undersupply of adequate housing for the region's population. SCAG should be championing and pursuing plans that will lead more surely to more housing production throughout the region, especially the development of homes which are more affordable to the working-class Southern Californians who are now priced out of home ownership and denied the significant economic and social benefits it provides.

There is ample evidence that the housing typology currently favored by state housing policy and in recent regional housing planning (i.e., as are reflected in Connect SoCal 2024) have inherent associated costs that make adequate housing unattainable for a great many Californians, even if economic incentives and regulatory streamlining are provided. The Turner Center for Housing

Innovation at UC Berkeley recently explained the current predicament in its study, *Making It Pencil: The Math Behind Housing Development* (originally published in 2019 and updated with current market data in December 2023.)² The study used as its example a 30,000 square foot, 120-unit multistory residential building with 120 parking spaces and 1,500 square feet of first-floor retail space. The example assumed a construction type which was a concrete podium first floor (classified under the state's residential building code as "Type 1") and wood frame construction above (classified as "Type 5"), or "five-over-one" construction. Even though their study deliberately ignored the effects of many costs, such as the foreseeable need for environmental study, affordable housing subsidization, demolition costs, infrastructure exactions, and made generously low assumptions about many other costs, the study ultimately found this typology of construction to be largely uneconomical. Specifically, the study states:

We found that it has become increasingly difficult to get projects to pencil in many parts of California, including the Bay Area, Sacramento, and Los Angeles. The example case study "deals" we created in 2019 for the most part are no longer financially viable in current market conditions. These changing market conditions help to explain why many typical market-rate multifamily projects are stalling across the state. (p. 2)

If projects like the one modeled in the study – which are like the projects that Connect SoCal 2024 envisions will be the solution to the state's housing crisis – cannot pencil out in the areas of the state that have the highest housing costs, they certainly would not be economically viable in the region's more affordable, non-coastal markets, where many Californians now must look to find affordable housing options. There are places for these types of projects, but the goal of providing ample housing for all our region's residents will not be met unless a wider variety of housing types is supported by policy, especially that which can foster new housing in non-urban areas, where land costs are lower.

Given how the Turner Center's study underscores the importance of an understanding the economics of housing to the resolution of the housing crisis, we invite SCAG to study and compare new and developing towns like Valencia (which currently has the highest job-generation rate in the entire SCAG region) with development and redevelopment projects within urban centers and narrowly-defined transit-oriented areas. We believe such a study will show that (1) the amount of public funding required to build or improve the infrastructure needed to support population growth is less for new towns and large master-planned communities, (2) that new towns and large master-planned communities can be as successful as urban developments in the generation of new jobs, if not more so, and that current VMT assumptions should be revised to address the amount of jobs generated by these new

² Garcia, David et. al, *Making It Pencil, The Math Behind Housing Development*, Turner Center for Housing Innovation, UC Berkeley, Dec. 19, 2023. <https://turnercenter.berkeley.edu/wp-content/uploads/2023/12/Making-It-Pencil-December-2023.pdf>

developments, (3) that it is more affordable to achieve climate resiliency goals like net zero energy use in new developments than in existing, more developed areas, and (4) that new towns and large master-planned developments can effectively set aside ecologically significant open space and generate funds necessary for the ongoing protection and enhancement of that open space.

- **Include Clear Limitations on the Prescriptiveness of the RTP/SCS:** We appreciate that the Draft Plan’s Demographics and Growth Forecast Technical Report (the “Growth Technical Report”) explains that SCAG’s technical, demographic growth modeling and mapping using transportation analysis zones (TAZs) should not be misinterpreted as being unduly prescriptive or prejudicial. Specifically, such text within the Draft Plan is found in the Growth Technical Report at page 45, which is labeled “5.5 TAZ-Level Growth Forecast, Growth Vision, and SCS Consistency,” and in footnote 3 on page 54. We believe that such helpful and important text should be significantly expanded upon and relocated to within the text of the Connect SoCal 2024 document itself, and be reflected in SCAG’s responses to comments in the final PEIR, rather than being relegated, as it is now, to only an accompanying report and a footnote. More specifically, we urge SCAG to include within the final Connect SoCal 2024, and reflect in the PEIR, the alternative text that is recommended in comments submitted by the Orange County Council of Government (“OCCOG”).

ORG 14-2

As Connect SoCal 2024 was developed over time, our Business Coalition has endeavored to follow the excellent work of SCAG’s staff and the thoughtful input from its Technical Working Group and the COGs within the region. The investment of time we made in understanding their work has greatly benefitted us as we analyzed the Draft Plan. In particular, we would like to draw your attention to the exhaustive review by OCCOG of the Draft Plan and the PEIR, which we understand will be included in their comment letter. We have reviewed this work and their recommendations to SCAG; and we believe the inclusion and reflection of the OCCOG’s work in the final Connect SoCal 2024 will enhance and improve it.

ORG 14-3

In summation, we wish to emphasize that the Business Coalition embraces the Draft Plan’s vision of a Southern California region that is more livable, prosperous, and accessible than it is today. Beyond the potential adoption of this plan, we look forward to working with SCAG on an expanded vision for the region that not only achieves important environmental and economic goals, but also provides the tools to foster the volume of housing production that is so desperately needed.

Finally, we appreciate the tremendous amount of time and effort that SCAG’s staff and leadership have put into this plan, and we further appreciate the opportunities for input and engagement that were afforded to the business community and other stakeholders throughout the 2024 RTP/SCS development process. Please let us know if you have any questions regarding our comments, concerns, and recommendations as outlined in this letter and we look forward to working with you to assure a Final Connect SoCal 2024 that strengthens our region and enhances the quality of life for all Southern Californians.

Sincerely,



Richard Lambros, Managing Director
Southern California Leadership Council



Tracy Hernandez, Founding Chief Executive Officer
Los Angeles County Business Federation (BizFed)



Jeff Montejano, Chief Executive Officer
Building Industry Association of Southern
California (BIASC)



Maria Salinas, President & CEO
Los Angeles Area Chamber of Commerce



LOS ANGELES AREA
CHAMBER OF COMMERCE



Jon Switalski, Executive Director
Rebuild SoCal Partnership



Jeff Ball, President & CEO
Orange County Business Council (OCBC)



ORANGE COUNTY
BUSINESS COUNCIL



Paul Granillo, President & CEO
Inland Empire Economic Partnership (IEEP)



Luis Portillo, President & CEO
San Gabriel Valley Economic Partnership





Jeremy Harris, President & CEO
Long Beach Area Chamber of Commerce



Dexter McLeod, Founder & Chairman/CEO
L.A. South Chamber of Commerce



Mike Lewis, Senior Vice President
Construction Industry Air Quality Coalition
(CIAQC)





World Be Well Organization

RE: Public Comment Connect SoCal

1/12/2024

World Be Well appreciates the opportunity to comment on the Southern California Association of Governments' (SCAG) Draft Connect SoCal 2024, Southern California's Regional Transportation Plan/Sustainable Communities Strategy (SCS). We applaud your vision that in 2050, Southern California will be a healthy, prosperous, accessible, and connected region for a more resilient and equitable future. It is reassuring to know that despite the staggering complexities involved in implementing that vision, as comprehensive as the plan is, it acknowledges that implementation happens at the local level.

Thankfully, the leadership team was comprised of representatives from our cities, counties, and local agencies where land use planning occurs. Collaboration is crucial to address our challenges.

World Be Well also congratulates SCAG on receiving a planning grant from the Strategic Growth Council under their Sustainable Agriculture Land Conservation (SALC) program.

World Be Well was also awarded a SALC grant to build organizational and financial capacity in Riverside and San Bernardino Counties. The Oswit Land Trust and Native American Land Trust were also awarded grants. We intend to serve as a conservation developer, seeking opportunities to work with landowners and developers to implement smart development that reduces the loss of agricultural lands and open spaces.

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Since 1984, Inland SoCal has traded 191,00 acres of farmland and open space for forty square miles of warehouses. We welcome the opportunity to collaborate with other land trusts and with SCAG on the planning grant award for an **Agricultural Lands Economic Benefit Study**.

World Be Well was instrumental in convincing CDFA to reconsider leaving Riverside San Bernardino off the regions list for the 2023 Urban Agriculture Grant Program. Neither Riverside nor San Bernardino have populations of 500,000 or more, yet we comprise the twelfth largest metro statistical area in the U.S. plus we have thirty cities over 50,000. We alerted them that according to their own criteria, our region would rank number one in tribal populations, second in low-income communities behind the eight county Bay Area, and number three in disadvantaged communities. Their reconsideration guarantees an \$800,000 block grant to the region, in addition to individual urban agriculture project awards. Our region's share of total funds available is projected to be around \$12 million.

Resistance by communities to zoning criteria that extract value, equity, health, and longevity from them is growing. A reconsideration of the costs and externalities that go unmitigated by our zoning decisions is warranted. We also recognize the realities of our rising land valuations and the pressure that bears on SCAG's target of preserving forty-one square miles of open space infill development.

SCAG's work helps facilitate implementation, but the agency does not implement or construct projects or have land use authority. SB 375 did not give SCAG and other metropolitan planning organizations any land use authority.

In the role of conservation developers, World Be Well will take advantage of potential match funds from NRCS-ACEP and RCA. Funding is also available via SCAG, private land developers, and other private donors. We have several market-based solutions to leverage potential tax incentives

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and match funding incentives for master community developers, who can capture value by including conservation development in the form of agrihoods in their projects. This is also one of the qualifying CEQA mitigation requirements for SCAG’s plan.

ORG 15-1

In your Supplemental Information section, you list the legislative mandates that informed this plan, and that impact your Healthy Communities Strategy. When I got to the letter **S**, I expected to see a reference for **SB 1000**.

SB-[1000 \(2015-2016\)](#) requires local governments to identify environmental justice communities in their jurisdictions and address environmental justice in their general plans, which serve as a local government’s “blueprint” for how the city and/or county will grow and develop.

It provides a policy framework for thriving communities. Taken as a collaborative lens and shared at the municipal level, SB 1000 should be considered a catalyst for managing the [vital conditions required for thriving communities](#).

Reliable transportation is one of the seven vital conditions needed for health and well-being. Given the urgency and overwhelm cities endure as they attempt to manage vital conditions that are out of balance and in an endless crisis mode, SB 1000 is a way to engage community and to speed up much needed capacity building to match the urgency our cities are facing.

Community-based organizations (CBOs) are best suited to press local governments to adhere to SCAG’s Sustainable Communities Strategy through the implementation of SB1000.

SCAG should work with CBOs to improve local government adherence to the SCS. SCAG should also make available its Regional Greenprint, web-based tool, to assist CBOs with the best available scientific data and scenario visualizations to support the SB1000 toolkits that organizations

ORG 15-2

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use to implement environmental justice elements into the general plans of their local jurisdictions.

World Be Well suggests incorporating the [SB 1000 Implementation Toolkit](#) available from the Environmental Justice Alliance. It offers a detailed and comprehensive way for cities to analyze and implement their strategies guided by the community's voice. It's a roadmap to a thriving region and consistent with SCAG's Healthy Communities Strategy.

World Be Well is encouraged by SCAG's commitment to mitigate loss of farmland where such loss will have significant and unavoidable Impacts. Most developers within the SCAG region that submit Environment Impact Reports under CEQA also note that while loss of farmland may have significant and unavoidable impact, they also claim that such loss is not mitigable.

ORG 15-3

World Be Well encourages the use of SCAGs advanced mitigation programs as tools that developers can use to mitigate their projects. However, enforcing mandatory mitigation mandates may adversely impact the use of voluntary mitigation that may provide charitable contribution benefits to landowners and developers under Section 170 of the U.S. Tax Code.

World Be Well looks forward to working with SCAG to minimize Greenfield development through the implementation of this Regional Transportation Plan/Sustainable Communities Strategy.

Yours in a world being well,



Gurumantra Khalsa
Executive Director

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Letter ORG 16 (Late)

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Monday, February 5, 2024 12:21 PM
To: 2024 PEIR
Subject: addendum to letter - post comment period
Attachments: EPA poised to reject Southern California smog plan - Los Angeles Times.pdf; Fight over I-15 express lanes exposes rift between freeway widening and California climate, pollution goals - Los Angeles Times Feb. 5, 2024.pdf

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Dear SCAG,

I just wanted to follow up on the comment letters I wrote on the PEIR with a couple of recently breaking stories highlighting the results from SCAG's Goods Movement Exceptionalism.

The EPA just proposed rejection of the State Implementation Plan for zone in the SCAQMD. Additionally, there was a freight corridor improvement project to widen I-15 that fraudulently stated that truck VMT and AADT wouldn't increase by adding lanes. The I-15 express lanes 'Freight corridor improvement project' passed through SCAG's conformity analysis without appropriate skepticism or oversight. It raises serious questions about SCAGs role in upholding transportation conformity.

If the EPA follows through, the region will lose billions in federal funding for transportation projects due to your ongoing Goods Movement Exceptionalism policy that is undermining attainment of the air quality standards. Please do your part SCAG.

Mike McCarthy

Riverside Neighbors Opposing Warehouses
92508



ORG
16-1

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CLIMATE & ENVIRONMENT

Los Angeles smog woes worsen as U.S. EPA threatens to reject local pollution plan



Smog hangs in the air as the sun sets on downtown Los Angeles in October 2023. (Luis Sinco / Los Angeles Times)

BY TONY BRISCOE | STAFF WRITER

FEB. 4, 2024 3 AM PT



The U.S. Environmental Protection Agency is preparing to reject California’s plan to curb air pollution in Los Angeles, a consequential move that could result in stiff economic sanctions and federal regulatory oversight of the nation’s smoggiest region.

Despite having the strictest air pollution rules in the nation, Southern California has never complied with federal health standards for ozone, the lung-searing gas commonly called smog. Because of this, state and local air regulators are required to submit plans to the EPA detailing how they intend to reduce pollution and comply with federal standards.

ORG
16-1
(cont.)



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California air regulators acknowledge that the region still needs to reduce smog-forming nitrogen oxides by more than 100 tons per day in order to achieve the 1997 standard for ozone.

However, the South Coast Air Quality Management District proposal calls on the federal government to make most of those cuts — at least 67 tons per day — arguing that some of the largest sources of smog-forming emissions are federally regulated, such as ships, trains and aircraft. Local air quality officials lack the jurisdiction to regulate mobile sources of emissions, and can only control stationary sources, such as industrial facilities.

ORG
16-1
(cont.)

ADVERTISING



In a recent draft response, the EPA has proposed rejecting California’s plan, declaring “states do not have authority” under the Clean Air Act or the Constitution to order the federal government to reduce pollution.

ORG
16-1
(cont.)

A fire burning deep inside an L.A. County landfill is raising new alarms over toxic air

Jan. 30, 2024

In a pointed response, local air officials claimed the EPA was responsible for the damaging health effects of Los Angeles area smog, because it has failed to offer solutions to curb emissions from “sources that they know are beyond our control.”

“U.S. EPA’s draft decision is disheartening,” read a statement from the air district. “South Coast AQMD intends to comment on this new proposal and take all appropriate actions in hopes that this decision does not become final. More importantly, U.S. EPA will need to answer the millions of residents, especially children, who have asthma, lung disease and other illnesses associated with air pollution that continue to suffer.”

The EPA has until July 1 to decide whether to finalize the rejection. If the state and local air regulators fail to submit a plan that the EPA finds acceptable within that time, the federal government could withhold billions of dollars in highway funding, place strict requirements on new permits and even impose a federal plan to curb smog.

The EPA has disapproved of the air district’s plans several times in the past, but the region has managed to avert potential sanctions.

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The proposed denial is the latest confrontation between Southern California air regulators and the Biden EPA — two unlikely adversaries who have clashed for nearly two years over how to solve the region’s long-standing issues with smog.

It has also highlighted the complex nature of regulating pollution in the region where at least three entities have authority — the local air district, which oversees smokestack emissions; the California Air Resources Board, which governs in-state vehicles; and the EPA, which handles interstate and international travel.

However, some environmental advocates say the dilemma is a collective failure by every level of government.

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(cont.)

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Adrian Martinez, a senior attorney with Earthjustice, said the conflict follows years of repeated delays and deadline extensions, when all three environmental agencies were capable of cutting more emissions.

“The plan to meet our clean air standards relied on these faith-based assumptions that we’ll figure out how to reduce the pollution at a later time. And what ended up happening is we never figured it out,” Martinez said.

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(cont.)

CLIMATE & ENVIRONMENT

Will storing CO2 in old oil fields slow global warming? First California plan nears approval

Jan. 14, 2024

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Historically, Southern California has been plagued by smog, which forms when the region’s persistent sunlight interacts with vehicle exhaust and smokestack emissions. The region’s mountainous terrain confines this toxic haze over the region, rather than allowing it to disperse.

Although there has been significant progress over the last several decades through the development of cleaner vehicle engines and pollution controls for industry, [the region’s smog remains the worst in the country.](#)

Since 1997, nitrogen oxides have decreased 70% in the air basin. The majority of those emission reductions are the result of stricter vehicle standards imposed by the state, and locally imposed regulations on industry, according to the South Coast air district.

As emission reductions have stalled and aircraft emissions have risen, the [air district has found itself under increasing pressure to force the EPA’s hand.](#) According to estimates, even if Southern California eliminates emissions from all building and industrial sources, it wouldn’t be enough to meet federal standards.

The [air district has sued the EPA for violating the Clean Air Act](#), arguing it was impossible for the region to comply with federal smog standards without massive cuts from federal sources. The move was intended to compel the EPA to adopt new regulatory strategies that would curtail pollution from ports, railyards and airports. The air district later settled the case.

ORG
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(cont.)

For its part, the Biden administration last year adopted tighter vehicle emission standards, including for heavy-duty trucks, which is expected to reduce smog.

But these federal requirements still pale in comparison to rules in California — the only state that can implement its own vehicle emission standards with federal approval.

“We acknowledge that there are sources of air pollution in South Coast that the air district and CARB do not have the regulatory authority to control,” an EPA spokesperson said in a statement. “EPA has made it a very high priority to help reduce mobile source emissions through rulemaking and leveraging unprecedented federal funding ... wherever possible.”

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(cont.)



CLIMATE & ENVIRONMENT

Could Culver City’s landmark deal to end oil production be a model for other cities?

Dec. 16, 2023

The EPA is [accepting public comments](#) on its proposed disapproval of the regional smog plan until March 4.

If the EPA finalizes this disapproval, California will have 18 months to obtain the federal agency’s approval for a new plan. By failing to meet that deadline, the federal government would require some newly permitted businesses to reduce twice as many tons of smog-forming as they emit.

Six months later, if the deadline still hasn’t been met, the Federal Highway Administration is required to impose a moratorium on highway funding (with exceptions for mass transit and public safety).

No more than two years after final disapproval, the EPA must enforce a federal implementation plan to achieve federal smog standards.

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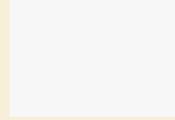
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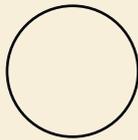
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Dec. 22, 2023



CLIMATE & ENVIRONMENT

CALIFORNIA



Tony Briscoe

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Tony Briscoe is an environmental reporter with the Los Angeles Times. His coverage focuses on the intersection of air quality and environmental health. Prior to joining The Times, Briscoe was an investigative reporter for ProPublica in Chicago and an environmental beat reporter at the Chicago Tribune.

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CALIFORNIA

California says it prioritizes climate goals over freeway widening. So why is the 15 Freeway getting more lanes?

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A view of the 15 Freeway south just north of the 10 Freeway interchange in Ontario. (Irfan Khan / Los Angeles Times)



BY RACHEL URANGA

STAFF WRITER | FOLLOW

FEB. 5, 2024 3 AM PT

FOR SUBSCRIBERS

Express lanes on eight miles of the truck-choked Interstate 15 will break ground this year and, officials promise, speed up commuters' slog through the Inland Empire's ever-growing sprawl of warehouses, subdivisions and polluted air.

But its contentious approval by the California Transportation Commission last month exposed a deepening rift in the state between its climate goals and the list of freeway widening projects that some say are gliding through without scrutiny and threatening the health of the people who live near them.

The U.S. Environmental Protection Agency is now looking into allegations that the San Bernardino County Transportation Authority and the California Department of Transportation may have misled it about the potential environmental harm the project could cause communities that breathe in some of the nation's worst air. Both say the project was vetted thoroughly and is sound.

In the Inland Empire, the \$388-million express lane project is the centerpiece of a plan to improve traffic along one of the nation's most congested freight corridors, where commuters going to school or work must navigate the deluge of big rigs carrying goods to and from the area's massive distribution centers. The new lanes would run roughly from the 60 Freeway to a few miles south of the 210 Freeway and connect to [Riverside County's toll lanes](#).

Plans for the lanes had been moving along [for more than a decade](#) with widespread support from federal, state and local agencies — until December, when Joseph Lyou, who was then a member of the California Transportation Commission, raised concerns about providing it \$202 million in state funds.

Lyou is president of the Coalition for Clean Air and a former board member of the South Coast Air Quality Management District. He said he was “at the end of his patience” with traffic-inducing freeway expansions that California officials had pledged to end to meet ambitious climate goals.

At the end of a daylong meeting in Riverside [on Dec. 7](#), he asked how planners could conclude that new lanes wouldn't cause more truck traffic in one of the [nation's worst freight bottlenecks](#). The analysis, he said, must be flawed.

“At a place like this Inland Empire community where warehouses pop up every other day — million-square-foot warehouses,” he told the commission. “Providing that additional capacity on that freeway influences whether we get more of those million-square-foot warehouses, and it will and can induce truck traffic.”

It was late in the day, and several commissioners had already left the chambers.

“You know, we few of us here left all recognize this issue of induced traffic,” he said. “And despite that, at every meeting, we are asked to make one or two exceptions to this rule, with this knowledge, and we widen freeway projects after widening freeway projects.”

The concept of induced traffic means the more space made for vehicles, the more drivers will come, making congestion worse and increasing greenhouse gas and health-harming pollutants. The \$1-billion 405 Freeway expansion through the Sepulveda Pass is an example. It was supposed to ease traffic , but it eventually grew worse, studies found.

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(cont.)



HOUSING & HOMELESSNESS

A bid to stop freeway expansions in California hits a roadblock: Organized labor

May 6, 2022

Lyou didn't expect anyone to pay much attention to his objections. A longtime environmental justice advocate, he said he is used to taking on powerful institutions and being ignored and even lied to.

But to his surprise that evening, two other commissioners, [Adonia Lugo](#) and [Darnell Grisby](#), both appointees of Gov. Gavin Newsom, joined him in voting against the project.

The 3-3 vote essentially stalled the plan.

The decision reverberated up and down the state.

“This may be a tipping point,” said Jeanie Ward-Waller, a former Caltrans executive and whistleblower who has accused the agency of skirting regulations to expand roads. “A lot of leaders have been saying for a long time that we don’t really do highway widening anymore, but they very much are still in the pipeline.”

Last year, Ward-Waller was demoted after accusing the [\\$20-billion agency](#) of bypassing rules to add highway lanes near West Sacramento. The commission determined that the agency acted legally.

Then in January, U.S. Secretary of Transportation Pete Buttigieg ordered the Federal Highway Administration to reopen its decision to exempt a highway expansion in Fresno from an environmental analysis. It came after a community group sued [Caltrans for failing to adequately assess](#) the environmental degradation that the already polluted, largely Latino neighborhoods around it could suffer.

In the Inland Empire, environmentalists argued that the planned express lanes on the I-15 will open up more space in other lanes for freight, stoking warehouse growth in an overwhelmed region.

“You’re just inviting more traffic which means more emissions, more cumulative impacts, more diesel, more exhaust, going into the communities,” said Ana González, executive director of the Center for Community Action and Environmental Justice in Jurupa Valley, where the lanes will be built. “Widening growth is not going to solve anything. In fact, it’s going to make it worse.”

She and several of her staff members who live in and grew up in the area have children with respiratory issues they suspect are linked to freight traffic.

“It was such a hard and stressful experience for me as a mom because you want to see your kids happy,” she said. “When they yell at you and tell you, ‘Mom, I can’t breathe,’ it’s like I feel helpless.”

The under-the-radar California Transportation Commission, or CTC, appointed by the governor and legislators, is charged with doling out billions of dollars in state transportation funds and it’s often the last stop for big projects that are decades in the making.

Most had expected the Interstate 15 vote to be procedural. The express lanes had already been assessed by the commission several times, and a bevy of other federal, state and local agencies had reviewed the plans.

Upset legislators and union trade representatives [began to urge the commission](#) to overturn the vote.

“If this can all be undone through a vote by the CTC,” a dozen legislators from the Inland Empire and surrounding areas said in a letter sent to the commission, “it would apply extreme risk to the local agencies seeking to advance these much needed projects to a status of readiness for our constituents.”



CALIFORNIA

A Caltrans executive questioned a freeway expansion. Then she was demoted

Oct. 10, 2023

Assemblywoman Sabrina Cervantes (D-Riverside), who represents the cities where the express lanes will go, noted that the county transit agency had already spent \$26 million of taxpayer funds on permits, agreements, environmental mitigation credits and staff hours. “The credibility of CTC is at stake, and the implications of that fact extend well beyond the project,” she said.

ORG
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(cont.)

Truck movement along the I-15 is a major driver of the Inland Empire economy.

The region has become the way station for the vast stream of Asian goods coming through the ports of Los Angeles and Long Beach, with one of the largest concentrations of warehouses in the U.S. Interstate 15 has become the gateway from those warehouses to the rest of the country, running from San Diego to Canada — and connecting to every interstate highway going to the Midwest and the East Coast.

Half of California's interstate heavy truck traffic is estimated to pass through the I-15 corridor.

But as new homes and warehouses grow closer to one another — and to increasingly congested freeways and side streets — more residents are exposed to ever more pollution.

The location of the project raised alarm bells for Lyou because it sits just upwind of [Mira Loma](#), where he knew there was an air monitoring device that had recorded some of the region's most elevated levels of particulate matter 2.5, exceeding acceptable air standard levels. The pollutant is associated with diesel trucks and is known to cause [asthma](#), [heart disease](#) and other ailments.

Lyou began to look deeper into the project's years-long record.

Among the documents he examined was a 2016 air quality review by a working group at the Southern California Assn. of Governments — the region's planning group and a clearinghouse for infrastructure projects. The group is made up of environmental regulators, Caltrans and other state and local officials. Failing its review could trigger a longer environmental analysis that could ultimately kill a project.

“No change in regional heavy — and medium trucks [is] anticipated,” the San Bernardino County Transportation Authority, or SBCTA, declared in its report to the

group. Like most documents emanating from the project, the SBCTA wrote it and Caltrans approved it as the lead environmental agency.

But the EPA pressed the agencies on that point, later sending out a list of questions to planners, which were reviewed by The Times.

“Why doesn’t the additional capacity associated with movement of light and medium duty traffic to the express lanes open up additional capacity for truck traffic and support continuing growth in development of warehouses and associated truck traffic in the area?” an unnamed EPA official asked.

The new lanes would free up congestion in the regular lanes, SBCTA consultant Don Hubbard said. But, the consultant said, “there is not a convenient alternative route to the I-15” that the new lanes would draw new truck traffic from, “therefore the demand heavy truck volume for the corridor will be the same whether the Express Lanes are constructed or not.”

He added that there was little space left in the region for new warehouses and that I-15 was only one of many features that have drawn the logistics industry to the area. Others included the Ontario International Airport, other major freeways, the ports and rail service.

“While it would be a benefit to the logistics industry for the Express Lanes to be constructed, it is only one of the factors considered in deciding to locate in the area.”

ORG
16-1
(cont.)



CALIFORNIA

Warehouse boom transformed Inland Empire. Are jobs worth the environmental degradation?

Feb. 5, 2023

In the end, the group cleared the project.

Lyou found a subsequent application from 2020 for tens of millions of dollars in trade corridor state funds to improve freight movement.

“The addition of express lanes will open up room for more freight,” Caltrans and SBCTA planners wrote in the application, reviewed by The Times. It projected that daily truck traffic would jump 20%.

Lyou says he came to believe that Caltrans and the SBCTA misled federal regulators to bypass environmental reviews that quantify the potential pollution from a project and force it to be offset. The costs of those offsets could be enough to kill a project.

Under [the Clean Air Act](#), federally supported projects can't worsen air quality in polluted regions such as the Inland Empire.

The final vote on the Interstate 15 express lanes was scheduled for a hearing at the Stanislaus County Administration Building in Modesto on Jan. 25.

Lyou's group, the Clean Air Coalition, sent out an [“action alert”](#) asking to “Help Us Stop a Highway Expansion Project!” At the bottom of the email were talking points for those calling in, along with a donate button.

At the meeting, dozens of hard-hat-wearing union construction workers held signs like “Roads, Roads, Roads” to make the case for new jobs.

The SBCTA opened with a presentation about the project explaining how the new express lanes tie into another toll lane completed in Riverside County and fit into the larger regional plan that extends deep into Orange County. The lanes' northern end would be near the terminus of the future Brightline project, a planned high-speed rail line from Rancho Cucamonga to Las Vegas.

“While we are diligently working to transform the Inland Empire towards a more sustainable tomorrow, we must continue to make investments in our highways to address the growth in population and the increase in containerized goods,” Raymond Wolfe, executive director of the SBCTA, told the commission.

Traffic at the port complex continues to grow, he said. The region needs the infrastructure inland that accommodates it.

“There is a clear disconnect in priorities because increasing throughput at the ports translates to more containers, which then require more warehouses and logistics capacity.”

Public testimony on both sides stretched [nearly two](#) hours. On the pro side: The project would provide well-paying jobs, ease congestion and complement rail transportation projects in the works. On the con side: Asthma would get worse, and more warehouses would loom over neighborhoods and bring even more traffic.

As the vote neared, a commissioner made an unusual proposal.

“I’d like to suggest that we as commissioners, myself included, limit ourselves to the same two-minute limit that we respectively asked two of our speakers,” said Carl Guardino, a [four-term commissioner](#) and former head of the policy trade association Silicon Valley Leadership Group.

The commission quickly approved the motion.

Lyou, who had prepared a 53-page slideshow to present his findings, was irate. In his four years there and decades attending government meetings, he can’t recall anything like this.

He called the time limitation “absolutely ridiculous” and rushed through his slides.

He pointed out the discrepancy in the two different findings, saying that the SBCTA and Caltrans can't say there won't be more truck traffic to the working group, which enforces the Clean Air Act, and then ask the state for money for money to improve freight movement that it says will increase truck traffic.

"That's a problem. It may involve fraud. It may involve violations of a lot of laws. That's what happened here," he told the commission.



CALIFORNIA

A toll lane future is inevitable in California as traffic congestion worsens

Dec. 20, 2019

ORG
16-1
(cont.)

He moved that the commission suspend the vote and force Caltrans and the SBCTA to explain "what the heck is going on."

The SBCTA defended the statements, saying they came from two different analyses and each had its own purpose.

"You're comparing those two different numbers with two different methodologies," Steve Smith, SBCTA's director of planning, told the commission. "We do not engage in fraud, we do not engage in falsification of data."

The working group's standards for its environmental assessment are "misunderstood," Kome Ajise, executive director of the Southern California Assn. of Governments, explained to the commission. Big-rigs aren't factored in to the environmental assessment because they aren't discretionary traffic. "Those trucks are compelled to be there."

Nobody is "faking it," he said.

The executive director of the commission said the difference in numbers was “not uncommon.”

Other commissioners weighed in. The project had been reviewed many times , they said, and it was too far along in the process to throw it into reverse.

“It’s been said before, the project is under contract, so I think we know what our particular duties are in this case,” Grisby said, changing his earlier position.

The commission voted 9 to 1 to approve the project.

Lyou’s “accusations are grossly inappropriate and dismissive of the thorough process applied to both the environmental clearance and the funding pursuits,” Tim Watkins, a spokesman for the SBCTA, later said. “I find it ironic that a commissioner who would use his position to solicit opposition to the recommendation of the commission staff as well as to seek donations for his private endeavors would cast aspersions on a transparent and well-vetted project.”

The environmental analysis was transparent and made a strong case, he said. It assumed a “fixed distribution of trucks,” meaning there would be no net increase of trucks in the region. Whereas the later analysis assumed a redistribution of trucks as a “worst-case scenario.”

The challenge with traffic modeling studies is they can be used to say what you want them to say, said Michael Manville, a UCLA urban planning professor at the Luskin School of Public Affairs who has not reviewed this project. “From the moment we first started using these models many decades ago, they have aspects of being a black box.”

There is no single modeling standard, only best practices. And experts still haven’t settled on the degree to which a newly built toll lane induces driving, he said.

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(cont.)

Lyou expects the commission to continue to approve these types of projects. But he won't participate. An appointee of California Assemblymember Anthony Rendon (D-Lakewood), Lyou was notified Wednesday by [Assembly Speaker Robert Rivas](#) (D-Hollister) that he would be replaced. Rivas named [Bob Tiffany](#), a former San Benito County supervisor who ran a car dealership for decades, to the commission.

"So did they manipulate the process to get through the track and then be able to get their funding several years later?" Ward-Waller asked. "Why else would you provide different data?"

"Joe Lyou was asking some very appropriate questions," she said. "But asking them at this stage, I think, is really, really hard for people because they just expect the money to keep flowing."

But, she said, standards are changing and she isn't sure that, if the working group were presented with this today, it would fly.

"The world has changed, and the way California sees induced [traffic] demand and treats it in environmental documents has changed since that time," she said. "We're at a point in time where there's just a huge amount of pressure on not doing projects like this anymore. I think the highway builders, the labor and industry folks are seeing this as a huge threat."

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Dec. 24, 2023



Rachel Uranga

Rachel Uranga covers transportation and mobility for the Los Angeles Times. She previously reported for the Los Angeles Business Journal, Reuters in Mexico City and Southern California News Group, where she later served on its editorial board.

ORG
16-1
(cont.)

January 12, 2024
Southern California Association of Governments (SCAG)
Ms. Karen Calderon

RE: Public comment on record for the Connect SoCal 2024 (2024-2050
Regional Transportation Plan/Sustainable Communities Strategy)

I thank you for the opportunity to express my concern about induced traffic
and how this plan is inadequate in addressing this growing issue — especially
in the Inland Empire.



IND 1-1

The above expresses visually my thoughts on adding lanes to existing roads which only adds more vehicles and more pollution without really improving safety over time.

Wider highways mean more vehicles and more pollution. Across the US, transportation is already responsible for 27% of the country's greenhouse gas emissions.

Some states and cities are looking at alternatives. In Los Angeles, an expansion to Interstate 710 was abandoned in 2022 after the chief planning officer noted the city didn't see "widening as a strategy" for the city.

In Portland, young climate activists have been fighting against a \$1.2 billion plan to widen the I-5 in a section which runs through a neighborhood called Albina, a historically Black neighborhood.

So, what's the answer? Matt Turner, an economics professor at Brown University, noted if you want more cars on the road, add more lanes. But that's not what most people want.

On the contrary, Transportation Secretary Pete Buttigieg said: "Connecting people more efficiently and affordably to where they need to go is a lot more complicated than just always having more concrete and asphalt out there."

Other options include more express bus lanes, cycle lanes, walking bridges, and light rail. Basically, people need affordable options to get them out of cars and off the roads.

"This is a make-or-break moment," . Ben Holland, an urban design and land use expert at clean energy non-

IND 1-1
(cont.)

profit RMI, told The Guardian. “How the states use highway funds will basically determine whether we meet our transportation emissions goals.”

IND 1-1
(cont.)

This proposed plan will become a major part of the problem for us not meeting our emission goals. Much needs to be revised instead of thinking that in 30 years zero emission vehicles will save us.

Widening roads and inducing traffic also has the problem of destroying neighborhoods — many times in minority communities — and also destroying important habitat directly with the roads and indirectly with encouraging more sprawling development.

IND 1-2

I look forward to reading how the revised plan addresses the concerns expressed above which must address both car traffic and goods movement.

Please keep me informed on all future documents and meeting related to **Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy**

Sincerely,

George Hague
92555

IND 1-3

The bold print in my letter comes from “Business Insider” by James Pasley (Feb 5. 2023) titled

"Some of the widest highways in the US have more than 20 lanes — but widening them won't solve traffic congestion"