



## EXHIBIT C

# Statement of Overriding Considerations for the Connect SoCal Plan



ADOPTED MAY 2020

**STATE CLEARINGHOUSE  
#20199011061**

## **Table of Contents**

<u>Section</u>	<u>Page</u>
1.0 Impacts of the Project and Associated Mitigation Measures.....	2
2.0 Benefits of the Connect SoCal Plan .....	3
3.0 Conclusion.....	8

## EXHIBIT C- STATEMENT OF OVERRIDING CONSIDERATIONS REGARDING THE FINAL PEIR FOR THE CONNECT SOCIAL PLAN

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

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

Consistent with these guidelines and the California Public Resources Code section 21081(b), The Final Program Environmental Impact Report (PEIR) for the Connect SoCal Plan ("Plan" or "Project") has identified and discussed significant environmental impacts that may occur as a result of implementation of the Plan and has made a good-faith effort to eliminate, minimize, and render less than significant all potentially significant adverse impacts that may result from implementation of the Plan through the adoption of feasible mitigation measures. SCAG made specific Findings pursuant to CEQA, on each of the significant environmental impacts of the Plan and on mitigation measures and alternatives. Nevertheless, even with implementation of feasible mitigation measures, many of the impacts may remain significant

and unavoidable. However, after considering the Project and the entire administrative record and weighing the Project's economic, legal, social, technological, environmental and other benefits, including region-wide or statewide environmental benefits, against its unavoidable environmental impacts, SCAG concludes that the benefits of the Plan outweigh its potentially significant and unavoidable adverse environmental impacts.

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

## **1.0 IMPACTS OF THE PROJECT AND ASSOCIATED MITIGATION MEASURES**

The PEIR identifies the following potentially significant and unavoidable impacts associated with the project:

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

3.21 Cumulative Impacts (Aesthetics, Agricultural and Forestry, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gases, Hazards and Hazardous Materials, Hydrology and Water Quality Materials, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services (Fire Protection, Police Protection, Schools, Library Services), Parks and Recreation, Transportation, Traffic, Safety, Tribal Cultural Resources, Utilities and Services Systems (Solid Waste, Wastewater, Water Supply), Wildfire

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

## **2.0 BENEFITS OF THE CONNECT SOCIAL PLAN**

The Plan recognizes the continuous growth in the region and balances region-wide policy goals established by SCAG, as well as legal requirements, for a long-range regional transportation plan and sustainable communities strategy that achieves these goals better than the alternatives (see **Section 7.0, Findings Regarding Plan Alternatives**). The goals, policies, objectives, strategies, and investments in the Plan were derived from an extensive collaborative process with public participation and consultation efforts led by the SCAG Regional Council and reflect broad agency and public support. As indicated in the **Executive Summary** of the Plan, the Plan will provide a return of \$2.06 for every dollar invested. The Plan provides \$316 billion of funding commitments for the preservation of the existing transportation system. Greater commitments in infrastructure preservation spending will ensure maintaining and even improving the productivity of our transportation system, thereby accruing greater benefits associated with mobility, congestion relief, economic activity, safety, and accessibility.

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

percent townhome units, and 42 percent multi-family units. This focus on development in high-quality transit and other existing opportunity areas, as well as the focus on multi-family, townhome, and single family (small lot) development will collectively help the region accommodate housing demand. The compact land use patterns described in the Plan, combined with the transportation network improvements and strategies identified in the Plan, would result in improved pedestrian and bicycle access to community amenities, shorter average trip length, and reduced vehicle miles traveled per person.

Compared with an alternative of not adopting the Plan, the Plan would accomplish improvements in performance measures in the following eight areas:

**1. Location Efficiency**

The development pattern of the Plan would accommodate the forecasted population, housing and employment growth while improving access to employment and services throughout the region. Additionally, land use patterns and strategies described the Plan, combined with transportation network improvements and strategies of the Plan would result in improved access to community amenities, shorter average trip lengths, and reduced vehicle miles traveled per person. Furthermore, conservation planning policies and strategies referenced in the Plan would support natural land restoration, conservation and protection. Benefits include but are not limited to:

- The Plan would result in an increase in the percentage of the region’s total household and employment growth occurring within Growth Priority Areas, from 58 percent to 60 percent and 70 percent to 72 percent, respectively.
- The Plan would result in a decrease the total amount of greenfield land consumed, from 64,120 acres to 45,370 acres.
- The Plan would decrease regional VMT per capita (24.19 miles to 23.08 miles<sup>1</sup>) and person hours of delay per capita (0.19 hours to 0.14 hours<sup>2</sup>).

**2. Mobility and Accessibility**

Connect SoCal works to address regional mobility and accessibility challenges by promoting job accessibility, enabling shorter commutes, making communities safer and encouraging lower-cost housing developments. Implementation of the Plan would increase transit services and ridership which serves as a key component of local, regional and state efforts to combat climate change, reduce

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<sup>1</sup> Includes Light/Medium and Heavy-Duty Trucks

<sup>2</sup> Includes Light/Medium and Heavy-Duty Trucks

congestion and improve accessibility to jobs and retail. Mobility and accessibility enhancements would improve the quality of life for the poor, recent immigrants, and the elderly by providing easier access to critical services.

- The Plan would result in a decrease in delay metrics across the board, including minutes of delay per capita; person hours of delay on highways, HOV lanes, and arterials; hours of delay for heavy duty trucks on highways and arterials; and mean commute time for all modes.

### **3. Safety and Public Health**

The Plan provides safety and public health initiatives such as active transportation strategies (i.e., bicycling and walking) by providing \$17.7 billion in capital funding for expanded active transportation networks and \$316 billion for operations and maintenance throughout the region. The Plan advocates for complete streets policies, promotes active transportation, pedestrian infrastructure and supports implementation on all non-limited access streets throughout the region and a range of planning resources. By expanding complete streets concepts to accommodate and optimize new technologies and micro-mobility options (e-scooters and e-bikes), first-last mile connections to transit and curbside management strategies, the region will achieve greater mode shift and reductions to VMT. Benefits include but are not limited to:

- The Plan would reduce rates of air pollution-related respiratory disease and associated costs due to a projected increase in daily per capita walking and biking and a reduction in driving.
- The mode share for walking and biking would increase for all trip types.
- Physical activity-related health outcomes would improve, including reductions in regional rates of obesity, hypertension, cardiovascular disease, and diabetes (type 2).
- Strategies such as complete streets, protected bikeways and safe routes to school infrastructure would improve safety for vulnerable road users as well as drivers.

### **4. Environmental Quality**

The Plan would encourage transportation investments that will result in improved air quality, reduced greenhouse gas emissions and protect natural lands and biological resources. Transportation interventions such as Transportation System Management strategies aim towards reducing traffic congestion, improve air quality and reduce greenhouse gas emissions. Additionally, land use strategies such as the Smart Cities and Job Centers aim to expand air quality, congestion and VMT reduction

benefits in the region. Natural land strategies aim to restore habitats degraded by pollution, invasive species, and protect wildlife corridors.

- The Plan would reduce criteria air pollutant emissions including ROG, CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions.
- The Plan would achieve greenhouse gas (GHG emissions) reduction targets required under the SB 375, with a reduction of per capita emissions of 19 percent by 2035.
- The share of all trips using a travel mode other than single-occupancy vehicle (SOV) would increase from 62.8 percent to 64.9 percent. A greater mode share for non-SOV will improve regional performance in regard to GHG emissions, per capita VMT, and air quality. It will also improve public health and traffic congestion outcomes.
- The Plan would result in 0.002 percent less natural lands consumption when compared to the No Project Alternative (21,514,000 acres to 21,513,400 acres).
- The Plan would result in 4.6 percent less total regional VMT when compared to the No Project Alternative. The Plan would decrease total regional VMT from approximately 536 million to 511 million when compared to the No Project Alternative.
- The Plan would result in 27.5 percent less area converted from agriculture to urban consumption when compared to the No Project Alternative (26,650 acres to 19,330 acres).
- The Plan would result in less energy and water used by residential and commercial buildings. Energy use would decrease by 0.89 percent when compared to the No Project Alternative (15,546 trillion Btu to 15,408 trillion Btu). Water use would decrease by 1.8 percent when compared to the No Project Alternative (89,712,225 acre-feet to 88,904,522 acre-feet).

## **5. Economic Opportunity**

The Plan will employ people to build, operate and maintain transportation projects as a result of the regional infrastructure investments outlined in the Plan (See Chapter 2.0, Project Description). The Plan would also increase accessibility to jobs. The Plan would encourage regional growth and employing transportation strategies in the 70+ job centers. These job centers range in size from over 250,000 jobs in the region's most urbanized areas, to roughly 1,500 jobs in rural areas – all with employment densities far higher than neighboring areas. When growth is concentrated in job centers, the length of vehicle trips can be reduced. Benefits include but are not limited to:



- The Plan would generate 264,500 new jobs annually due to improved regional economic competitiveness and 168,400 new jobs due to investments in the regional transportation system.
- Reduction of traffic congestion would increase employment growth as drivers would require less travel time from place to place.
- Reduction of local traffic congestion would also increase employment growth as downtowns and pedestrian-oriented neighborhoods would increase walkability, thereby providing high amenity locations that are attractive to businesses.
- The Plan would bolster the regional goods movement system by improving accessibility to goods from ports to local businesses.
- The Plan would result in \$4.7 billion in total cumulative energy cost savings when compared to the No Project Alternative
- The Plan would result in \$2.2 billion in total cumulative water cost savings when compared to the No Project Alternative.

## **6. Investment Effectiveness**

- The Plan will provide a return of \$2.06 for every dollar invested and save \$346million in annual healthcare expenditures.

## **7. Transportation System Sustainability**

- The Plan allocates \$316 billion toward maintaining and operating the transportation system in a state of good repair. This amounts to an average annual per capita investment of about \$562 per person for each year of the Plan.

## **8. Environmental Justice**

The Plan advocates for the implementation of an Environmental Toolbox or set of mitigation strategies, which include recommended practices and approaches for performance areas that may result in disproportionate adverse impacts on EJ communities. The toolbox can be a resource to local jurisdictions or EJ stakeholders to combat disproportionate adverse impacts on EJ communities. Implementation of the Plan would result in the following benefits:

- Conditions will improve regionally for Environmental Justice communities in accessibility to employment, services, parks and education facilities, and impacts along freeways (travel time and travel distance savings).
- Reduction of active transportation hazards, climate vulnerability and public health issues (i.e., obesity, asthma) on EJ communities.
- Reduction in jobs-housing imbalance, neighborhood change and displacement.
- Reduction of regional and local emissions impacts, roadway noise impacts and rail-related impacts.

### **3.0 CONCLUSION**

SCAG acknowledges that despite all feasible mitigation measures, approval of the Project may result in significant adverse and unavoidable impacts associated with implementation of the Plan. However, for the foregoing reasons and based on the Final PEIR and the entire administrative record, SCAG hereby determines that when the impacts are balanced against the Project's specific benefits, the benefits of the Project outweigh the impacts and warrant approval of the Project. While the Project's impacts cannot be reduced to a level of less than significant, the Project balances the need for SCAG to meet its legal requirements to adopt a long-range regional transportation plan and sustainable communities strategy which will maintain and improve the productivity of our transportation system and accrue benefits associated with improved regional mobility, congestion relief, economic activity, safety, and accessibility, and the need to protect the environment of Southern California to the greatest extent feasible.

For the above-mentioned reasons, the SCAG Regional Council hereby concludes that the benefits of the Plan outweigh and override any adverse environmental impacts associated with the Plan, and warrants approval of the Plan.



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FOR THE CONNECT SOCIAL PLAN

ADOPTED MAY 2020

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