

COMMUNITY INPUT

# PUBLIC PARTICIPATION AND CONSULTATION

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS



APPENDIX 3B

COMMENT LETTERS CI - CL  
ADOPTED ON SEPTEMBER 3, 2020



PUBLIC PARTICIPATION AND CONSULTATION

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APPENDIX 3B  
COMMENT LETTERS CI - CL

[connectsocial.org](http://connectsocial.org)

# APPENDIX 3B

## COMMENT LETTERS CI - CL

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City of California City  
Community Development Department



To: Southern California Association of Governments  
900 Wilshire Blvd ste 1700  
Los Angeles, CA 90017

California City has thousands of people (10,500 from Kern County) who commute between our city and SCAG. Our projections show this number growing in the future. The City of California City would like to see more information and studies on inter-regional travel. Specifically between SCAG and San Diego County, Kern County, and Santa Barbra County. As you know, travel sheds and commute patterns do not stop at region boundaries. Interregional communication is key for Southern California's success.

Thank you for your consideration,

Shawn Monk,

City Planner



CITY OF COSTA MESA

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January 24, 2020

Southern California Association of Governments  
Connect SoCal Team  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

Dear Connect SoCal Team:

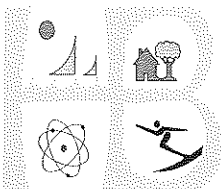
The City of Costa Mesa appreciates the time and effort undertaken by the Southern California Association of Governments (SCAG) staff in its efforts to develop a RTP/SCS of our large and diverse metropolitan planning area. The City of Costa Mesa remains committed to doing its fair share in addressing regional issues and appreciate the comment and review period provided by SCAG for the Connect SoCal Plan and its associated PEIR.

The City would like to express its support of recommendations and comments submitted by the Orange County Council of Governments, Orange County Transportation Authority, and Center for Demographic Research. We strongly recommend that all comments and concerns from these bodies be implemented into the Connect SoCal Plan and the associated PEIR.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry Curtis", with a stylized flourish extending from the end.

Barry Curtis, AICP  
Director of Economic and Development Services



# City of Huntington Beach

## DEPARTMENT OF COMMUNITY DEVELOPMENT

Planning Division

Code Enforcement Division

Building Division

January 23, 2020

Draft Connect SoCal PEIR Comments

Attn: Roland Ok

Southern California Association of Governments

900 Wilshire Blvd., Ste. 1700

Los Angeles, CA 90017

Submitted via email to: [2020PEIR@scag.ca.gov](mailto:2020PEIR@scag.ca.gov)

### **RE: CITY OF HUNTINGTON BEACH DRAFT CONNECT SOCIAL AND PEIR COMMENT LETTER**

Dear Mr. Ok,

Thank you for the opportunity to submit comments on the Draft Connect SoCal plan and Program EIR. The City of Huntington Beach appreciates SCAG's public outreach efforts for this process and offers the following comments and concerns for your consideration.

#### *High Quality Transit Areas (HQTAs)*

HQTAs are defined as "corridors that have at least a fifteen minute headway (time in between the next scheduled service) during peak hours bus service." According to RTP/SCS maps, all of Beach Boulevard within the City of Huntington Beach is defined as a HQTA. However, based on the October 13, 2019 Orange County Transportation Authority (OCTA) Bus Schedule<sup>1</sup>, there are no bus stops on Beach Boulevard within the City of Huntington Beach with headway times of 15 minutes or less. Route 29 services Beach Boulevard from the City of La Habra to PCH in Huntington Beach. The shortest headway time during peak hours for bus service is on the Route 29 stop at PCH/1<sup>st</sup> Street (not a stop on Beach Boulevard) traveling southbound with an average headway time of 18.23 minutes during the PM peak hours. Most stops have an average peak hour headway time of approximately 19-25 minutes. Some stops, such as the Beach Boulevard/Talbert Avenue stop, have peak hour headway times of 40-49 minutes. One stop (Beach Boulevard/Atlanta Avenue) did not list any stop times as part of any route for this stop. It must also be noted that OCTA eliminated Route 211 in October 2019, which serviced Huntington Beach to Irvine (a major Orange County job center) due to low ridership.

<sup>1</sup> OCTA Bus Book <http://www.octa.net/ebusbook/CompleteBusBook.pdf>

Further, OCTA's 2018 Long Range Transportation Plan (LRTP)<sup>2</sup> includes Figure 4.1 – *Local, Community, and Bravo! Final Route Recommendations*. This figure recommends that Route 29 receive a reduction in frequency of service. This will add further delay to the 19-25 minute average peak hour headway service times on Beach Boulevard.

The Connect SoCal Plan and PEIR must utilize practical application of HQTAs as they operate and are planned for in order to implement the statute objectives of the RTP/SCS, including promoting an improved intraregional relationship between jobs and housing. The City of Huntington Beach recommends revising the HQTAs throughout Connect SoCal and the PEIR to accurately reflect available data regarding actual bus service and planned bus service on Beach Boulevard. Based on SCAG's definition of a HQTA, the entire length of Beach Boulevard in Huntington Beach does not qualify as a HQTA and must be adjusted accordingly.

The Connect SoCal Plan and PEIR also include other transportation related errors in Orange County, as identified by comments made by OCTA. The City of Huntington Beach expresses support for OCTA's comments as they pertain to errors and inconsistencies between the existing and planned Orange County transportation network and the RTP/SCS and PEIR. For example, the OCTA Board has not approved conversion from HOV to tolled express lane for SR-55, SR-73, I-605, or north of I-605 on I-405 as depicted in the proposed regional express lanes network. The potential regional express lane network is currently subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility. Additionally, Connect SoCal regional strategies rely on improvements beyond the projects submitted by OCTA, and implementation of the strategies is subject to availability of new revenue sources, necessary project development, and review processes by the implementing agencies.

#### *RHNA Growth Exceeds General Plan Growth*

Section 3.14 – Population and Housing of the Connect SoCal PEIR includes four guiding principles related to Growth Forecasts approved by SCAG's Regional Council on August 1, 2019:

Principle #1: The draft plan forecast for Connect SoCal shall be adopted by the Regional Council at the jurisdictional level, thus directly reflecting the employment, population and household growth projections derived from local input and previously reviewed and approved by SCAG's local jurisdictions. The draft plan growth forecast maintains these projected jurisdictional growth totals, **meaning further growth is not reallocated from one local jurisdiction to another.**

Principle #2: The draft plan forecast at the Transportation Analysis Zone (TAZ) level is **controlled to be within the density ranges of local general plans or input received from local jurisdictional** in this most recent round of review.

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<sup>2</sup> OCTA Long Range Transportation Plan, Figure 4.1 <http://www.octa.net/pdf/OCTALRTP111618FINAL.pdf>

Principle #3: For the purpose of determining consistency for California Environmental Quality Act (CEQA) streamlining, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the Plan.

Principle #4: TAZ level data or any data at a geography smaller than the jurisdiction is included in the draft plan forecast only to conduct the required modeling analytical work and is therefore, only advisory and non-binding as SCAG's sub-jurisdictional forecasts are not formally adopted as part of the Plan.

The SCAG RHNA methodology is inconsistent with Principle #1 and #2. The currently proposed draft 6<sup>th</sup> Cycle RHNA methodology reallocates "residual" existing need across jurisdictions within the same county. The reallocation is assigned to jurisdictions based on transit accessibility (50%) and job accessibility (50%), and excludes Disadvantaged Community jurisdictions which have over 50% of their populations in very low resource areas using California Tax Credit Allocation Committee (TCAC)/HCD Opportunity Indices.

Further, the cumulative impacts of the reallocation, projected need, and existing need result in a total RHNA that exceeds 1.0368 times planned household growth from the SCAG region<sup>3</sup>. While 1.0368 is the overall exceeded household growth in the region, each jurisdiction may be given a RHNA allocation that exceeds their General Plan growth even further as a result of the reallocated "residual" existing need calculation.

The PEIR also states that although the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process. The PEIR does not provide any meaningful analysis or supporting evidence to demonstrate how this will be accomplished. The currently proposed draft 6<sup>th</sup> Cycle RHNA methodology which includes reallocated "residual" need and growth exceeding SCAG local jurisdiction General Plan forecasts is not consistent with the goals of Connect SoCal, including the following:

Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods

Goal 4. Increase person and goods movement and travel choices within the transportation system

Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.

The City of Huntington Beach is unable to accommodate any reallocated growth due to a lack of transportation options, which is not consistent with Connect SoCal Goals 2, 4, or 9. As a result, the SCAG RHNA methodology is wholly inconsistent with Connect SoCal and the PEIR must address this information.

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<sup>3</sup> SCAG 6<sup>th</sup> Cycle RHNA Draft Allocation Methodology November 7, 2019  
<http://www.scag.ca.gov/programs/Documents/RHNA/RHNA-Draft-Methodology.pdf>



### Support for Comments and Recommendations Submitted by Other Groups

The City of Huntington Beach expresses support for comments made by OCTA as they pertain to errors and inconsistencies between the existing and planned Orange County transportation network and the RTP/SCS and PEIR, as noted above. The City also 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:

1. SCAG must utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space and entitlements are properly reflected for the RTP/SCS and PEIR.
2. CDR PEIR comments #33, #35, and #54 to add the following text: "SB 375 requires the determination to be based upon population projections by the Department of Finance and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted and used in the regional transportation plan is within a range of 1.5 percent of the regional population forecast completed by the Department of Finance 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 1.5 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 the Department of Finance. 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."
3. 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.
4. OCCOG comments to revise the definition of a HQTAs used in the RTP/SCS and RHNA to be consistent with the definition of a HQTAs in SB 375 and the Strategic Growth Council. This is necessary to ensure the SCAG region is able to compete for available funds related to transit-oriented housing.
5. OCCOG comments opposing any alternative in the PEIR that does not utilize local input, including the intensified land use alternative. The RHNA must be consistent with the RTP/SCS as required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m).
6. 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. Further, any mitigation measure that includes a new fee or tax to be adopted at the jurisdictional level must be revised to clarify that it is an option for implementation and not a requirement. Also clarify whether the assumed revenue from the suggested new fees were included in the financial plan or economic analysis of the RTP/SCS.

Conclusion

Thank you for the opportunity to comment on the Draft Connect SoCal plan and Program EIR. The City of Huntington Beach appreciates SCAG's commitment to a fair and transparent process and will continue to be an active participant during the RTP/SCS update and 6th cycle RHNA process.

Sincerely,



Nicolle Aube, AICP  
Associate Planner

Cc: Ursula Luna-Reynosa, Director of Community Development  
Jennifer Villasenor, Deputy Director of Community Development  
Jane James, Planning Manager



January 24, 2020

Draft Connect SoCal Plan Comments  
ATTN: Connect So Cal Team  
Southern California Association of Governments  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

**RE: PUBLIC REVIEW AND COMMENT ON THE DRAFT CONNECT SOCIAL PLAN (2020-2045 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY) AND PROGRAM ENVIRONMENTAL IMPACT REPORT.**

Connect So Cal Team,

Thank you for providing the City of Indio's Planning Division the opportunity to review and comment on the draft Connect SoCal plan (also known as the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy or RTP/SCS). After reviewing the information provided, comments pertaining to the draft Connect SoCal document and draft Program Environmental Impact Report the following updates and comments are being provided for consideration:

**I. General Plan Update**

In response to Table 3.8-4 *California Jurisdiction Addressing Climate Change in the SCAG Region (2019)* on the Draft Program EIR we would like to provide and update for the three items that were (IP) In Progress (1) GHG Reduction Plan, (2) Climate Action Plan, and (3) General Plan Policy. On September 18, 2019 the City Council approved the City of Indio 2040 General Plan Update (Resolution No. 10107) and Climate Action Plan (Resolution No. 10108). The General Plan addresses the mandatory elements required by state law that are Land Use, Housing, Circulation (Mobility), Conservation, Noise, Open Space and Environmental Justice. It also includes optional elements of Community Facilities and Infrastructure, Health and Equity (inclusive of Environmental Justice), Economic Development and Implementation. The Climate Action Plan establishes the City's goals for addressing and implementing measures consisting of policies, programs, and/or plans to achieve emissions reductions that would meet or exceed the established GHG reduction targets. The three items on the table mentioned

COMMUNITY DEVELOPMENT DEPARTMENT

above can be updated to (A) Adopted with the addition of the General Plan Implementation Measures.

Below are current City projects aimed to reduce GHG emissions, encourage active transportation, and integrate shared mobility.

**II. Multi Modal Hub Feasibility Study**

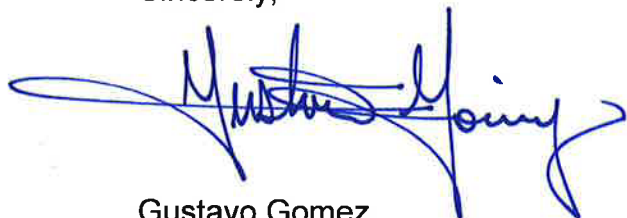
The City applied to Caltrans for a Sustainable Planning Grant. The grant analyzed and evaluated fifteen (15) sites for a future Multi-Modal Hub site in the City of Indio. Furthermore, in collaboration with RCTC and Caltrans the feasibility study identified the selected site for use for passenger rail services. The passenger rail route is being planned as Special Events Train to operate between Los Angeles Union Station and Indio. The Special Events Train will serve the Coachella Valley Music and Arts Festival and Stagecoach Festival. The feasibility study looks at existing and proposed transportation system to provide multi-modal services such as park-and-ride, transit connections, bikeshare. The study includes site development, management and operations, maintenance, costs and funding. The Multi Modal Hub Feasibility Study is planned to be completed and adopted by February 2020.

**III. Complete Streets Plan**

The City of Indio 2040 General Plan's Mobility elements outlines the goals and objectives for the Complete Streets Master Plan. The purpose of the Complete Streets Plan is to enhance connectivity across all travel modes. Although the City of Indio has over 20 miles of existing bikeways and various miles of existing sidewalks, there are still critical connectivity gaps for both bicyclists and pedestrians. As part of this project, transit, bicycle, and pedestrian connectivity improvements identified in the Mobility Element are being reviewed in the Complete Streets Plan to identify remaining connectivity gaps and identify projects to address these gaps. The Complete Streets Master Plan is expected to be completed by early 2020.

Thank you for your consideration of these comments. Should you have any questions please feel free to contact me at [REDACTED]

Sincerely,



Gustavo Gomez,  
Assistant Planner

COMMUNITY DEVELOPMENT DEPARTMENT  
[REDACTED]



January 24, 2020

Mr. Kome Ajise  
Executive Director  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, California 90017  
[ConnectSoCal@scag.ca.gov](mailto:ConnectSoCal@scag.ca.gov)

**Subject: Comments on Connect SoCal, the Draft 2020 Regional Transportation Plan/Sustainable Communities Strategy and Draft Program Environmental Impact Report**

Dear Mr. Ajise:

The City of Irvine appreciates the opportunity to review and provide comments on Connect SoCal, the Draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) and the Draft Program Environmental Impact Report (PEIR). The draft 2020 RTP/SCS and PEIR is a significant effort and the City of Irvine 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.

The following general comments and recommendations are offered by the City of Irvine on the 2020 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 2020 RTP/SCS, PEIR, all associated appendices and documents, and online inventory of maps.

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

Mr. Kome Ajise  
January 24, 2020  
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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. 2020 RTP/SCS Growth Forecast

The City of Irvine greatly appreciates the close coordination between SCAG and CDR on behalf of the City of Irvine to ensure the 2020 RTP/SCS growth forecast accurately reflects development agreements; entitlements; projects recently completed or under construction; open space; and general plan densities.

Additionally, the City of Irvine supports a growth forecast that is adopted at a geographic level no lower than the jurisdictional level. The City of Irvine provided SCAG with a detailed and accurate land use dataset and growth forecast during its eighteen (18) month Bottom-Up Local Input and Envisioning Process and through the submission of the 2018 Orange County Projections (OCP-2018) dataset.

On December 11, 2019, CDR provided SCAG with the technical corrections to the draft 2020 RTP/SCS growth forecast dataset on behalf of the City of Irvine and all other Orange County jurisdictions. The technical corrections ensure the final 2020 RTP/SCS growth forecast accurately reflects entitlements; development agreements; projects recently completed or under construction; open space; and general plan densities. On January 8, 2020, CDR requested, on behalf of the City of Irvine and all other Orange County jurisdictions, a copy of the final draft growth forecast dataset to confirm that all the technical corrections have been included in the final 2020 RTP/SCS growth forecast. On January 14, 2020, CDR was informed that SCAG would not provide a copy of the final draft growth forecast to CDR for review until mid-February 2020.

**It is strongly recommended that SCAG utilize the 2018 Orange County Projections (OCP-2018) dataset provided to SCAG during its Bottom-Up Local Input and Envisioning Process to ensure that general plan capacities are not exceeded and all open space, development agreements, and entitlements are properly reflected.**

The City of Irvine opposes any alternative in the PEIR that does not utilize local input, or at the very least, the jurisdictional totals provided through the local input process should be used. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction should not be utilized as the preferred alternative. We further note the failure to rely on accurate jurisdictional-level data divorces the 2020 RTP/SCS from the methodology proposed in the RHNA as required by

Mr. Kome Ajise  
January 24, 2020  
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Government Code Section 65080 (b)(2)(B) and Section 65584.04(m) and we believe this must be remedied in the final 2020 RTP/SCS.

3. High Quality Transit Area (HQTA)

The alignment of SCAG's Regional Housing Needs Assessment (RHNA) and RTP/SCS documents is required by Government Code Section 65080 (b)(2)(B) and Section 65584.04(m). The proposed methodology SCAG submitted to the Department of Housing and Community Development (HCD) indicates that the HQTAs identified in the RTP/SCS using the 2045 planning year are to be used for RHNA purposes of evaluating "transit access." The City of Irvine has expressed concern throughout the RHNA methodology development process with the utilization of the Interstate 5 Bus Rapid Transit (BRT) corridor. The HCD approved RHNA methodology identifies three station stops within the City of Irvine, however, the Interstate 5 BRT project and the three station stops have not been approved or vetted by the City and are not certain. The City of Irvine requests that the station stops within the City of Irvine or potential references to them be removed from the RTP/SCS.

4. 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 and responsive to changing technological advances.

5. Maintain Unbiased, Objective Tone

Language throughout the draft 2020 RTP/SCS, the PEIR, and the associated appendices has a tendency to be leading and dramatic in its emphasis of certain key issues, such as active transportation, public health, and land use policy. While these issues are important, using opinion-based and emotionally-charged language is inappropriate in this context.

SCAG should remove, wherever applicable, opinion and biased 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 Enclosure 1.

Mr. Kome Ajise  
January 24, 2020  
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## 6. “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 measure rests 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 of Irvine 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)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of Senate Bill 375 (SB 375) upon respective local agencies’ land use authority, the City of Irvine 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.

The City of Irvine recommends SCAG change all language in all project level mitigation measures to read “~~can and should~~ consider where applicable and feasible.” This change will clarify that the project level mitigation measures are a menu of options.

## 7. 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. 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 mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with



Mr. Kome Ajise  
January 24, 2020  
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existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures.

#### 8. Cities vs. Jurisdiction

Throughout the 2020 RTP/SCS, PEIR, and associated appendices, there are references to “cities”. Since the SCAG region also includes counties, it is recommended that references to “city” or “cities” are changed to “jurisdiction” or “jurisdictions” where appropriate.

#### 9. Spell out Acronyms Prior to Using Abbreviations

There are many different abbreviations used throughout the documents. To avoid confusion and help persons unfamiliar with technical jargon, spelling out the acronyms prior to using them for the first time is common; however, this is often missing in the 2020 RTP/SCS documents.

#### 10. Provide Sources for All Graphics and Tables

When a report of such complexity as the 2020 RTP/SCS 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 reaching and could download the image separate and apart from the technical explanation accompanying it in the electronic version of the document. Without source information embedded in the graphic, information can be spread without proper attribution. The City of Irvine understands 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.

#### 11. Fees and Taxes

Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, therefore, it should not be assumed that they will be approved.

The City of Irvine recommends that SCAG reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. SCAG should also clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

Mr. Kome Ajise  
January 24, 2020  
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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 2020 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. If you have any questions, please do not hesitate to call me.

Sincerely,



Pete Carmichael  
Director of Community Development

Enclosure: Detailed Comments on the 2020-2045 RTP/SCS, PEIR, and Related Appendices – City of Irvine

cc: John Russo, City Manager  
Marianna Marysheva, Assistant City Manager  
Michelle Grettenberg, Deputy City Manager  
Mark Steuer, Director of Public Works and Transportation  
Jaimee Bourgeois, Deputy Director of Transportation  
Tim Gehrich, Deputy Director of Community Development  
Kerwin Lau, Manager of Planning Services  
Melissa Dugan, Supervising Transportation Analyst  
Marika Poynter, Principal Planner  
Marnie Primmer, Executive Director, OCCOG (email)  
Deborah Diep, Director, Center for Demographic Research (email)



## CITY OF LAGUNA HILLS

January 24, 2020

Delivered Electronically

Mr. Kome Ajise, Executive Director  
 Southern California Association of Governments  
 900 Wilshire Blvd., Ste. 1700  
 Los Angeles, CA 9001

Re: City of Laguna Hills Comments for Connect SoCal; 2020 RTP/SCS and PEIR

Dear Mr. Komise:

The City of Laguna Hills appreciates SCAG's efforts to address complex regional issues and to collaboratively plan with local jurisdictions. The City of Laguna Hills respectfully provides the comments below concerning SCAG's 2020 RTP/SCS known as Connect SoCal (the Plan).

### Local Input

The City supports the use of data provided to SCAG on behalf of the City by Cal State Fullerton's Center for Demographic Research (CDR) via OCP-2018. At this time the City understands that CDR has not yet been given the opportunity to review the final RTP/SCS growth forecast. The City does not support any intensification of the City's land uses in the proposed RTP/SCS beyond the local input provided in OCP-2018.

### Interstate 5 (I-5) High Quality Transit Area (HQTA) Proposal – South Orange County

The City is perplexed by the Plan's proposal to designate I-5 in south Orange County as a High Quality Transit Area. The Plan refers to HQTAs as corridor-focused growth areas within one half mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. No such transit access currently exists anywhere in south Orange County, and based on the City's understanding of the Orange County Transportation Authority's (OCTA) operations, no such transit access is contemplated. Without the appropriate supporting transit, an HQTA designation for I-5 is not justified.

Nearly 360,000 motorists travel the I-5 daily in South Orange County, and volumes are expected to grow 25 percent by 2045 (OCTA, 2019). Increasing higher intensity housing uses along the I-5 will merely add congestion without reducing per capita VMT since limited transit alternatives



for commuting to job centers exist for South County residents. While OCTA and CalTrans are working to implement various widening projects to improve capacity of the I-5, there are no plans associated with CalTrans or OCTA projects to add any infrastructure typically associated with an HQTAs. In addition, a substantial portion of the land area adjacent to I-5 in south Orange County is constrained by steep slopes, flood control improvements, rail infrastructure, water and sewer infrastructure, and open space. There may be pockets of areas that exist along the I-5 that could arguably transition to higher intensity land uses under the Plan (such as near existing Transit Priority Areas), but these pocket growth areas do not justify the designation of the entire I-5 corridor as an HQTAs. Therefore, the City requests that the HQTAs designation be revised on the I-5 corridor to extend no further south than El Toro Road. The City believes revising the HQTAs in this manner is appropriate given a variety of land use and planning factors that exist in the area. These factors lend themselves to supporting a transition to higher intensity land uses contemplated by the Plan in the City of Laguna Hills.

Sincerely,



David Chantarangsu  
Community Development Director  
City of Laguna Hills



City of La Habra

*"A Caring Community"*

**COMMUNITY DEVELOPMENT**

110 E. La Habra Boulevard  
 Post Office Box 337  
 La Habra, [REDACTED]  
 Office: [REDACTED]  
 Fax: [REDACTED]

December 19, 2019

Southern California Association of Governments  
 Attn: Roland Ok  
 900 Wilshire Boulevard, Suite 1700  
 Los Angeles, California 90017

Re: Draft Connect So Cal Program Environmental Impact Report Comments

Dear Mr. Ok,

Thank you for the opportunity to review the "Draft Connect So Cal Program Environmental Impact Report". As you are aware, the California Environmental Quality Act allows potentially affected agencies to comment on proposed projects that may cause significant environmental impacts to their community. Given the nature of the project, the following are our concerns and comments:

**DOWNLOADS**

Draft Connect SoCal Plan- No comments.  
 Chapter 0: Making Connections- No comments.  
 Chapter 1: About the Plan- No comments.  
 Chapter 2: SoCal Today- No comments.  
 Chapter 3: A Path to Greater Access, Mobility and Sustainability- No comments.  
 Chapter 4: Paying our Way Forward- No comments.  
 Chapter 5: Measuring our Progress- No comments.  
 Chapter 6: Looking Ahead- No comments.  
 Glossary: No comments.

**TECHNICAL REPORTS**

**Active Transportation-**

Page 19. Discuss why Figure 7 and Figure 9 are different but with the same title.  
 Page 42. Figure 27- The graph is difficult to interpret. The Y-Axis is speed and the X-Axis appears to be percentages. It has been proven that higher speeds cause more injuries and deaths but this particular graph does not make sense. The Y-Axis appears to be a percentage...a percentage of what?  
 Page 51. Figure 30- Some of the colors appear to be the same. Please use different colors so that the data can be understood.  
 Page 99. Don't "fade" the north Orange County area. Show the entire County including the La Habra and Brea area. The header can be relocated to another location on the page.

Connect SoCal PEIR  
12/19/19  
Page2

Aviation and Airport Ground Access- No comments

Congestion Management- No comments

Congestion Management- Appendix 1

Page 2. Define SOV (Single Occupancy Vehicle)

Demographics and Growth Forecast- No comments

Economic and Job Creation Analysis

Page 4. There needs to be discussion bringing Los Angeles Metropolitan Transit Authority (METRO) facilities into Orange County. METRO and Orange County Transportation Authority (OCTA) need to start discussing this soon if they have not already.

Emerging Technology- No comments.

Environmental Justice- No comments.

Goods Movement

Page 116, Exhibit 25- Title obstructs Collision Density data. Please relocate the Title.

Page 128- The Burlington Northern Santa Fe Railroad has already adopted design standards to accommodate future electrification of their rail system by requiring addition clearance for new overhead bridges over their tracks.

Highways and Arterials

Page 21, The I-405 Project between State Route 73 and I-605 is already underway. The completion year stated in the document is 2026. Is this completion date correct?

Natural and Farm Lands Conservation- No comments.

Passenger Rail- No comments

Performance Measures- No comments.

Project List- No comments

Public Health- No comments

Public Participation and Consultation- No comments.

Sustainable Communities Strategy- No comments.

Sustainable Communities Strategy- Appendix 1- No comments.

Transit

Page 32, Exhibit 7- The High-Quality Transit Corridors don't appear to match maps in previous Exhibits (Passenger Rail). One shows a High-Quality Transit Corridor along Harbor Boulevard and the other one does not.

Transportation Conformity Analysis- No comments.

Transportation Finance- No comments.

Transportation Safety and Security

Page 56, Mitigation is spelled wrong in the Title on the right side of the page. Please check the second sentence under this same Title. I think the sentence should read "Very large earthquakes (M>7.5) on the San Andreas Fault are both the most uncommon and potentially the most devastating to the region and the nation." These types of large earthquakes are not the most common type of earthquakes in Southern California.

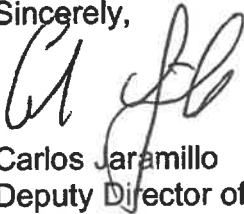
Transportation Safety and Security- Appendix 1- No comments.  
Connect SoCal PEIR  
12/19/19  
Page 3

Transportation Safety and Security- Appendix 2- No comments.

We are prepared to assist you in addressing the above concerns. We would request that a copy of the draft environmental impact report be forwarded to the City where modified to address the City's concerns for review and comment. Additional comments may be generated based on that review.

If you should have any questions concerning the comments, please feel free to contact Mr. Chris Johansen, P.E., City Engineer at [REDACTED]

Sincerely,




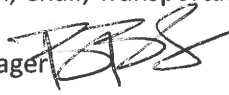
Carlos Jaramillo  
Deputy Director of Community Development

cc: Andrew Ho, Director of Community Development  
Chris Johansen, P.E., City Engineer

**CITY OF LOS ANGELES**  
**INTER-DEPARTMENTAL MEMORANDUM**

Date: January 16, 2020

To: Honorable City Council  
c/o City Clerk, Room 395  
Attention: Honorable Mike Bonin, Chair, Transportation Committee

From:  Seleta J. Reynolds, General Manager   
Department of Transportation

Subject: **Draft Connect SoCal (2020 Regional Transportation Plan / Sustainable Communities Strategy)**

**SUMMARY**

This report recommends that the City Council authorize the Los Angeles Department of Transportation (LADOT) to submit comments on behalf of the City of Los Angeles (City) to the Southern California Association of Governments (SCAG) on the draft Connect SoCal Plan (2020 Regional Transportation Plan/Sustainable Communities Strategy).

**RECOMMENDATION**

1. APPROVE the comments provided in this report to be submitted on behalf of the City in response to the draft SCAG Connect SoCal Plan.
2. DIRECT LADOT to transmit comments to SCAG that are substantially consistent with those contained in this report.
3. DIRECT LADOT to work with SCAG to incorporate the comments into the Final Connect SoCal Plan and related Programmatic Environmental Impact Report (Program EIR).

**BACKGROUND**

Every four years, the Southern California Association of Governments prepares a Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the six-county region. The draft 2020 RTP/SCS, Connect SoCal, includes planned transportation projects and demographic projections through 2045. Connect SoCal presents a strategy for investing \$638 billion into the region's transportation network over the next 25 years and a Sustainable Communities Strategy (SCS) for the six-county region.

Required by SB 375, the SCS focuses on reducing greenhouse gas (GHG) emissions from vehicles and light trucks by integrating land use and transportation planning, expanding transit, implementing transportation demand management, and leveraging new transportation technologies to reduce vehicle trips. The California Air Resources Board (CARB) set a regional GHG emissions reduction target for the SCAG region. The target addressed by the draft Connect SoCal Plan is to reduce GHG emissions eight percent below 2005 per capita emission levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. In addition to the regional target, CARB indicates a 25 percent GHG reduction is needed



by 2035 in order to meet the State's climate action goals. While SCAG anticipates the implementation of Connect SoCal will achieve both the 2020 and 2035 GHG reduction targets, the plan's Program Environmental Impact Report (Program EIR) indicates that Connect SoCal is not forecasted to achieve the reductions that CARB has determined necessary to meet the State's climate action goals. Connect SoCal's inability to meet the statewide reduction target may inhibit cities from relying on the plan. While it may be infeasible to consider a scenario that meets the more aggressive statewide target, SCAG should continue to partner with state and local agencies to pursue innovative solutions that reduce regional vehicle miles traveled (VMT) and resulting greenhouse gas emissions. These strategies may need to reach beyond traditional land use policies involving growth forecasting, and additionally consider market solutions like roadway pricing, broad scale fleet electrification, electric charging infrastructure, and new transportation technology partnerships that fundamentally alter the incentives for drive-alone trips.

SCAG could further support lowering regional VMT by leading a regional VMT reducing credit system, or 'VMT exchanges' similar to cap and trade markets. VMT exchanges could enable more sustainable outcomes throughout the six-county region by collecting off-set credits to reinvest in sub-regionally managed programs, like subsidizing transit passes for students. Metro has already demonstrated that such programs can lower the demand to drive alone. These investments could also potentially reverse the national trend of falling transit ridership. We are supportive of innovative strategies in the SCAG mitigation measures listed on page 3.17-62 to 3.17-64 of the Program EIR, and offer to be an active partner in these efforts.

SCAG recently conducted a series of workshops across the region, including in-depth graphic and narrative presentation materials. The City appreciates the outreach effort, both to the City and across the region.

Following the release of the draft Connect SoCal Plan on November 7, 2019, LADOT reviewed the draft plan and compiled the proposed comments to SCAG. The discussion included in this memo represents comments and concerns related to LADOT's goals and strategies.

## **DISCUSSION OF POLICY CONCERNS AND COMMENTS**

### Policy and Planning Framework

Since the adoption of the 2016 RTP/SCS, the City of Los Angeles adopted several plans and policies that further the legislative framework that informs the Connect SoCal. We are pleased to see SCAG acknowledge the City's Mobility Plan 2035 as a substantial advancement since the adoption of the 2016-2040 RTP/SCS. The Mobility Plan 2035 fundamentally shifted the City's priorities by adopting goals that include designing for safety first, building a world class infrastructure with a 'complete streets' planning framework, access for all Angelenos, more collaboration and informed choices, and a clean environment and health community. These goals align with the goals of SB 375 to reduce greenhouse gas emissions that are a bi-product of travel, especially drive-alone trips.

Since the adoption of the Mobility Plan 2035, the City continues to put the plan into action with meaningful results. In advancing the safety first goal, LADOT released the *Vision Zero Action Plan*<sup>1</sup> which aims to eliminate traffic-related deaths by 2025.

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<sup>1</sup> [Vision Zero Action Plan](#), January 2017.

LADOT's Strategic Plan *Great Streets for Los Angeles*<sup>2</sup> released in January 2018 describes the department's vision to provide access to safe and affordable transportation choices that treat everyone with dignity and support vibrant inclusive communities. This Strategic Plan includes actionable strategies that advance the department's priorities through 2020.

Transportation technologies have changed rapidly within the past five years. LADOT released a transportation technology strategy titled, *Urban Mobility in a Digital Age*<sup>3</sup> in August 2016, which focuses on building a solid data foundation, leveraging technology and design for a better customer experience, creating partnerships for more complementary shared services and prepare for an automated future. In November 2019, LADOT released the Technology Action Plan that outlines the visions defined in the *Urban Mobility in a Digital Age*. This action plan provides guidance for LADOT to clearly communicate physical and virtual platforms that maximize equity and livability.

Lastly, Mayor Eric Garcetti released *LA's Green New Deal*<sup>4</sup> in April 2019, which sets aggressive goals for the City's sustainable future, tackles the climate emergency with accelerated targets to reduce greenhouse gas emissions, strengthens our economy and middle class, and sets the City on course to be carbon neutral by 2050.

We would like to underscore the strong commitments the City has made to advance innovative and sustainable transportation strategies that have the potential to transform the historical reliance on the personal automobile. In the creation of the Final Connect SoCal Plan, we invite SCAG to draw from the vast array of transformative strategies that can increase the share of sustainable trips, especially those that scale at the regional level.

#### Transportation System Project List

The RTP includes an extensive project list. As stated in the Project List appendix, the list is divided into three primary sections, as follows: 1) The Federal Transportation Improvement Program (FTIP), which forms the foundation of the RTP project investment strategy and represents the first six years of already committed funding; 2) the Financially Constrained list of projects not included in the FTIP but which have "reasonably available" funding; and 3) Strategic Plan projects representing an unconstrained list of potential projects that the region would pursue given additional funding and commitment.

LADOT closely reviewed the three Transportation Project lists. The City's requested revisions are categorized under the three RTP project list categories:

- *FTIP*: A small number of projects that were removed in a recent FTIP amendment remain on this draft list. This list should be updated to reflect the most recent FTIP amendment;
- *Financially-Constrained RTP*: SCAG should work with the City to ensure all eligible projects and programs are captured in the final list. There are some projects that have identified funding, under construction or being implemented that are omitted that should be included; and

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<sup>2</sup> [Great Streets for Los Angeles](#), January 2018.

<sup>3</sup> [Urban Mobility in a Digital Age](#), August 2016.

<sup>4</sup> [L.A.'s Green New Deal](#), April 2019.

- *Strategic Projects*: Some projects on this list were identified from adopted Community Plans and include projects related to decreasing automobile delay and improving the outdated Level of Service (LOS) metric. The City is re-evaluating whether these projects are compatible with the policy goals of SB 743. Several Community Plans are anticipated to be updated over the next few years and City staff may work with SCAG to ensure this projects on this list are compatible with current City policy goals.

Following the review of the Transportation Conformity Analysis Technical Report, Table 63 should reflect any changes made to the FTIP Project List included in the Project List Technical Report.

LADOT recently initiated the Mobility Investment Program (MIP), which represents the department's data-driven effort to capture and plan for mobility investments that advance the City's values and vision for transportation. The MIP institutes project-delivery best practices to identify funding opportunities early in project development, enhance project engagement and evaluation protocols, pursue formalized interagency collaboration, and establish short- and long-term capital improvement plans. As a comprehensive, map-based inventory of both funded and unfunded projects, LADOT will utilize the MIP to develop short-term (five year) and long-term (20 year) plans to serve as the Department's infrastructure playbook that will prioritize the City's mobility investments. In coordination with the RTP project lists, the MIP will be cross-referenced to ensure the projects within the City are included on the appropriate RTP project lists and reflect a similar level of priority and implementation timeframe identified by the City.

We suggest that the SCAG staff responsible for compiling the Transportation System Project List meet with LADOT Planning and Policy staff prior to adoption of the Final Connect SoCal Plan to ensure project information is up to date. Should the RTP Project Lists be updated to address any of the comments mentioned above, LADOT requests SCAG closely coordinate with City staff on the revisions.

#### SB 743 Implementation

In 2013, the State of California signed SB 743 into law, which requires a shift in the way cities measure environmental impacts. State guidelines require all cities to update their transportation impact analysis metrics from level of service (LOS) to vehicle miles traveled (VMT) before July 1, 2020. In July 2019, the City of Los Angeles adopted new CEQA Transportation thresholds, accompanied by updated Transportation Assessment Guidelines, to comply with SB 743.

The City acknowledges SCAG's efforts noted in the Connect SoCal plan to support and assist in the implementation of SB 743 throughout the region. One notable effort was the assistance provided through the Sustainability Planning Grants, of which several jurisdictions took advantage of including the City of Los Angeles. LADOT encourages SCAG to continue taking a leadership role in providing technical assistance to cities beyond the State's deadline to comply.

SCAG's in-house data and transportation modeling expertise could be leveraged to provide hands-on assistance to the jurisdictions within the SCAG region that may not have the staff resources or funding to appropriately respond to the State mandate. SCAG's leadership could narrow the gap in staff capacity and available funding by developing sub-regional sketch planning tools and recommending uniform

thresholds to be considered for each sub-area Council of Governments (COG). SCAG should continue to help develop VMT exchanges by providing more technical capacity and regional forums with a goal to better serve areas of the region with fewer mitigation options. Continued research on these topics will allow for more efficient implementation of SB 743 across jurisdictional lines in order to achieve the intended outcomes of the legislation: promote reductions in greenhouse gas emissions, develop multimodal transportation networks, and diversify land uses.

### Emerging Transportation Technology

Transportation technology has evolved rapidly over the last five years. Micro-mobility and on-demand transportation services, including Transportation Network Companies (TNCs) and dockless devices have dramatically changed how people travel within the City of Los Angeles and the SCAG region. The draft Connect SoCal plan's Emerging Technology Technical Report initiates a discussion on how these technologies impact travel behavior regionwide.

Connect SoCal alludes to the possibility of emerging technologies disrupting the transportation system and increasing VMT. We encourage SCAG to take a more proactive approach to integrating new transportation technologies in a way that promotes sustainable travel choices and meets the region's greenhouse gas emission reduction goals. LADOT's strategy for regulating, monitoring, and evaluating emerging transportation technologies is outlined in *Urban Mobility in a Digital Age*. The groundwork by which LADOT will implement this plan and regulate emerging technologies can be found in LADOT's Technology Action Plan (TAP).<sup>5</sup> LADOT recommends SCAG provide guidance in Connect SoCal to help cities throughout the region effectively manage new innovations operating in public spaces and neighborhoods.

Cities host a suite of operational and regulatory services that include moving people to safety during emergencies, sometimes shutting down streets, providing safe passage to those wishing to gather and demonstrate, and managing and pricing the curb to regulate parking and deliveries. New technology enabled modes require technological tools to enforce regulations, streamline customer service, and empower private companies to provide service equitably and responsibly. SCAG should consider both the needs and the opportunities of government agencies within their jurisdiction to leverage the technological advancement that brings both challenges and opportunities. In September 2019, LADOT deployed the Mobility Data Specification (MDS) to regulate dockless mobility. We urge SCAG to consider advancing the role of MDS and other digital regulatory tools to better plan for evolution in the transportation technology landscape.

Lastly, public transit use has declined over the past few years both throughout the SCAG region and nationwide. As the regional Metropolitan Planning Organization, SCAG plays a unique leadership role in policies and programs that support public transit use and sustainable transportation modes.

### Transportation Model Review

As SCAG updates and makes changes to the transportation model, LADOT urges SCAG to work closely with City staff to ensure those changes are consistent with existing datasets and forecasts. LADOT uses SCAG's transportation model as the foundation for the City's transportation model. Transparency in the

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<sup>5</sup> [Technology Action Plan](#), November 2019.

development of the model, baseline model assumptions, and framework are valued and critical components of the update process.

### Conclusion

The draft Connect SoCal Plan and Program EIR provide a long-range vision that aims to balance future regional mobility and housing needs with economic, environmental, and public health goals. The plan represents a six-county effort to meet both State and Federal requirements and GHG reduction targets. If approved, the comments in this report will be submitted to SCAG by LADOT on behalf of the City of Los Angeles.

### **FINANCIAL IMPACT**

This report contains comments regarding proposed policies and projects included in the draft Connect SoCal Plan (2020 RTP/SCS) and related Program EIR. The comments to be transmitted to SCAG will not impact the City's General Fund.

SJR:pl



# City of Mission Viejo

## Office of the City Manager

**Brian Goodell**  
Mayor

**Trish Kelley**  
Mayor Pro Tem

**Wendy Bucknum**  
Council Member

**Greg Raths**  
Council Member

**Edward Sachs**  
Council Member

Electronic Transmittal:  
[ConnectSoCal@scag.ca.gov](mailto:ConnectSoCal@scag.ca.gov)  
[2020PEIR@scag.ca.gov](mailto:2020PEIR@scag.ca.gov)

January 22, 2020

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

Dear Mr. Ajise:

**Subject:** City of Mission Viejo Comments: Draft Connect SoCal and Draft Connect SoCal Program Environmental Impact Report

The City of Mission Viejo respectfully submits comments on the Southern California Association of Government (SCAG) draft 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and its associated Draft Program Environmental Impact Report (EIR), also known as Connect SoCal and the Connect SoCal Program EIR.

The comments provided below identify broader policy inquiries that surfaced as we reviewed the Connect SoCal documents. SCAG's responses to these inquiries will further assist in our understanding of the achievement of SB 375 greenhouse gas emissions reductions on the Connect SoCal Plan and its EIR alternatives, in addition to a clearer understanding of the application of Connect SoCal policies and EIR mitigation measures on local government projects.

The City of Mission Viejo comments are as follows:

**Greenhouse Gas Emissions Reductions:**

1) Connect SoCal Program EIR; Section 4; Alternatives:

**Discussion:** One of the primary objectives of Connect SoCal is to achieve SB 375 greenhouse gas emissions reduction targets for Year 2020 and Year 2035. The Connect SoCal Plan and the Program EIR identify that the Proposed Plan exactly meet the Year 2020 and Year 2035 GHG emissions reduction targets for cars and light-duty trucks of a per capita 8% and 19% reduction, respectively (PEIR: Table 3.8-10: SB 375 Analysis, page 3.8-74).

Mr. Kome Ajise  
 City of Mission Viejo Comments: Draft Connect SoCal & Draft Connect SoCal Program EIR  
 January 20, 2020  
 Page 2 of 4

The Draft Program EIR Alternatives section further outlines three alternatives for analysis: the No Project Alternative, Existing Plans-Local Input Alternative, and Intensified Land Use Alternative. As discussed below, the City of Mission Viejo recommends that the Program EIR be revised to include a quantification and consistent discussion on the amount of GHG emissions reduction that would be achieved for each EIR alternative.

This request is of particular importance, since Connect SoCal is based upon a land use distribution that differs from the Local Input received from SCAG jurisdictions. While the total numbers of population, households and employment are consistent at the jurisdiction level with the input provided by local jurisdictions on their future growth estimates, the proposed Connect SoCal plan internally shifts, within jurisdictions, future growth proximate to Priority Growth Areas such as high quality transit areas, resulting in a land use distribution that differs from the Local Input distribution, to reduce Vehicle Miles Traveled (VMT) and reduce greenhouse gas emissions.

Recommendations: Given that the distribution of land uses is different between the proposed Connect SoCal Plan, the Local Input Alternative, and the Intensified Land Use Alternative, the PEIR should clearly identify and consistently discuss in the narrative of each EIR Alternative, how much per capita GHG emissions reduction would be achieved for both Year 2020 and Year 2035, for all the EIR Alternatives, as follows:

- a) Table 4.0-1: Comparison of Connect SoCal and Alternatives (pages 4.0-7 –4.0-9) should be revised to include an “element” that addresses the amount of SB 375 GHG emissions reduction that would be achieved for Year 2020 and Year 2035 for the Connect SoCal Plan and each of the EIR Alternatives.
  - b) The narrative in the Alternatives section should be revised to consistently identify and reference how much GHG emissions reduction is achieved, for both Year 2020 and Year 2035, for each of the discussed Alternatives.
- 2) Connect SoCal Program EIR; Section 4; Alternatives: Alternative 3: Intensified Land Use Alternative:

Discussion: The Draft EIR discussion for the Intensified Land Alternative (pages 4.0-40 and 4.0-41) states that the transportation-related GHG emissions generated by this Alternative is projected to be less than the Connect SoCal Plan, because it generates less VMT. The Draft EIR further states that the Intensified Land Use Alternative is projected to achieve the 2020 target of 8% per capita reduction, and would exceed the 19% reduction for Year 2035 (actual amount is not specified; see Comment #1 above).

The draft EIR then proceeds to conclude that “Since meeting the regional reduction goals from cars and light-duty trucks would not be sufficient to meet the state’s overall GHG reduction goals, this alternative would conflict with AB 32 and SB 32. The Plan would have the same impact as this alternative.”

Mr. Kome Ajise  
 City of Mission Viejo Comments: Draft Connect SoCal & Draft Connect SoCal Program EIR  
 January 20, 2020  
 Page 3 of 4

Recommendation: Please re-review the paragraph cited above. Its conclusion (that the Intensified Land Use Alternative and the Connect SoCal Plan GHG emissions reduction capabilities are not sufficient to meet the targets) seems contradictory and perhaps incorrect, based on the data cited.

**Vehicle Miles Traveled:**

3) Connect SoCal Program EIR; Section 3:8 Greenhouse Gases: SB 743 and VMT Guidance

Discussion: The Draft Program EIR includes detailed discussion on the statewide and regional emphasis to reduce VMT as a mechanism to tackle greenhouse gas emissions reductions goals established under AB 32, SB 32 and the California Air Resources Board’s Scoping Plan. However, the Draft EIR further states that “even if all MPOs meet their regional SB 375 GHG targets, the state would not be able to meet the statewide GHG reduction goals of AB 32, SB 32 and the Scoping Plan.” (page 3.8-80).

Recommendation: Please clarify if there is any discussion in the draft Connect SoCal Plan, the Draft SoCal EIR or any of the technical appendices of said documents, that either identifies, recommends, or infers the attainment of a specific VMT reduction policy, target or performance measure for the SCAG region, or that may be imposed upon local governments.

**Draft EIR Mitigation Measures:**

4) Draft Connect SoCal EIR Mitigation Measures: Table ES-5: Summary of Project Impacts, Mitigation Measures and Residual Impacts

Discussion: The Draft Program EIR discusses two tiers of mitigation measures: mitigation measures that would be applied to SCAG, and mitigation measures that would be applied to local jurisdictions and other lead agencies responsible for project-specific environmental review documents for specific projects. The project level mitigation measures are currently structured with a reference of “can and should”, as follows:

“In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project *can and should* consider mitigation measures to reduce substantial adverse effects .....”. (emphasis added).

Recommendation: The Draft EIR (page ES-16) states that the project level mitigation measure approach of “can and should” provides detail on possible mitigation measures that can be considered by Lead Agencies as they conduct environmental assessments of specific projects. The Draft EIR further recognizes that flexibility should be maintained in the application of mitigation approaches, given the variety and scope of projects proposed in the 6-county SCAG region. The Draft EIR further identifies narrative that the application of the “can and should” approach, “be considered by lead agencies in





Mr. Kome Ajise  
City of Mission Viejo Comments: Draft Connect SoCal & Draft Connect SoCal Program EIR  
January 20, 2020  
Page 4 of 4

project-specific environmental review documents *as appropriate and feasible.*" (emphasis added).

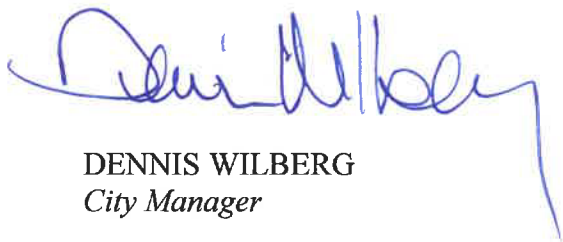
The City of Mission Viejo fully supports flexibility in the application of the project-level mitigation measures, and recommends that the each of the project-level mitigation measures listed in the Draft Connect SoCal Program EIR be revised to also include the reference "as appropriate and feasible," as follows:

"In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should, as appropriate and feasible, consider mitigation measures to reduce substantial adverse effects .....

The City of Mission Viejo appreciates the opportunity to provide comment on the broader policy issues raised herein, and also expresses support of the comments and recommendations on the Draft 2020 RTP/SCS and PEIR by the Orange County Council of Governments, the Orange County Transportation Authority, the Center for Demographic Research, and other Orange County agencies whose comments support Connect SoCal with its use of the Orange County's growth forecast – the 2018 Orange County Projections.

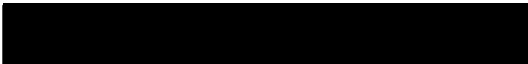
Should you have any questions on this transmittal, please do not hesitate to contact either Elaine Lister at [REDACTED] or Mark Chagnon at [REDACTED]

With appreciation,



DENNIS WILBERG  
*City Manager*

- c: City of Mission Viejo City Council
- Elaine Lister, Director of Community Development
- Mark Chagnon, Director of Public Works
- Larry Longenecker, Planning and Economic Development Manager
- Philip Nitollama, Traffic/Transportation Engineer
- Nate Farnsworth, OCCOG TAC Chair
- Marnie O'Brien Primmer, OCCOG Executive Director
- Gail Shiomoto-Lohr, GSL Associates



Claudia Manrique – City of Moreno Valley – Associate Planner

Connect SoCal Team:

The City of Moreno Valley appreciates the opportunity to submit comments on Southern California Association of Governments' (SCAG) Draft Connect SoCal Plan (also known as the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy or RTP/SCS). It is important that the Connect SoCal Plan is equitable, achievable, and results in sustainable development.

The City of Moreno Valley has reviewed the draft Connect SoCal Plan and related technical studies. Based on our review, the City of Moreno Valley has the following comments:

1. I-215 from I-10 to I-15 should be included as an existing major Goods Movement corridor.
2. SR60 through the Badlands to I-10 should be included as part of the Primary Highway Freight System.
3. Plan does not reflect current Riverside County Transportation Commission (RCTC) study / strategy for Metrolink and Express Bus expansion.
4. Arterial Network included is not complete for City of Moreno Valley.
5. The Planned Regional Express Lane Network should be updated to reflect recent Riverside County Transportation Commission (RCTC) decisions.
6. Active Transportation discussion should include the importance of consistent standards and maintenance for regional trail systems.
7. Bicycle Network is not complete for the City of Moreno Valley.
8. There is a need to compare the Draft Connect SoCal Plan with the proposed 6<sup>th</sup> Cycle RHNA for compatibility.

CITY OF



ONTARIO

ONTARIO

FAX

PAUL S. LEON  
MAYOR

DEBRA DORST-PORADA  
MAYOR PRO TEM

ALAN D. WAPNER  
JIM W. BOWMAN  
RUBEN VALENCIA  
COUNCIL MEMBERS

January 24, 2020

SCOTT OCHOA  
CITY MANAGER

SHEILA MAUTZ  
CITY CLERK

JAMES R. MILHISER  
TREASURER

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

**Subject: Comments by The City of Ontario on the Draft 2020 Regional Transportation Plan/Sustainable Communities Strategy (*Connect SoCal*) and Draft Program Environmental Impact Report**

The City of Ontario appreciates the opportunity to comment on the Draft Connect SoCal Plan and technical support documents. We acknowledge the extensive work that was put forth and look forward to the Plan supporting a sustainable future for the region and the City of Ontario.

The City has the following comments:

The City of Ontario has actively engaged in the local input process including commenting on the Map Book. The September 21, 2018 comments provided to SCAG are not reflected in the published Draft Map Book on the SoCal Connect website (see attachment). These include revisions to:

- Major Transit Stops and High Quality Transit Corridors
- Federally Designated Flood Hazard Zones
- Bike Trails
- General Plan Land Use Maps

We look forward to working with SCAG and SBCTA to further the Connect SoCal Plan. Thank you for your consideration. We look forward to hearing from you.

Sincerely,

Cathy Wahlstrom, Planning Director  
City of Ontario

Attachment

cc: Scott Murphy, AICP, Executive Director, Development

**From:** [Diane Ayala](#)  
**To:** [REDACTED]  
**Subject:** 2020 RTP/SCS- Map Correction Submittal  
**Date:** Friday, September 21, 2018 9:20:15 AM  
**Attachments:** [Bike Trail Zip File.zip](#)  
[Map corrections comments.pdf](#)

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Please see the following comments or corrections to Maps:

1. Truck Routes (corrections attached)
  - Holt Blvd from Grove to west City limits is not identified as a route
  - 4<sup>th</sup> street, Etiwanda, and Merrill are Truck Routes
  - <http://www.ontarioplan.org/wp-content/uploads/sites/4/2015/05/M-5-Truck-Routes.pdf>
2. Major Transit Stops and High Quality Transit Corridors (correction attached)
  - Add the Ontario Mills Stop
3. Major Transit Stops and Transit Priority Areas (correction attached)
  - Add the Ontario Mills Stop
4. Federally Designated Flood Hazard Zones (comment attached)
  - The City Policy Plan (General Plan) identifies the area south of SR-60 to the southern city limit, east of Haven Avenue is identified as a 500-year Floodplain
  - <http://www.ontarioplan.org/wp-content/uploads/sites/4/2015/05/flood-hazards.pdf>
5. Bike Trails
  - Attached is the zip file for the Bike Trails. Only the segments noted as "Completed" in the status field have been built.
6. Updated General Plan and Zoning with Specific Plan shapefiles
  - Please retrieve files at this location under file "planning"

If you should have any questions, please feel free to contact me.

Diane

**Diane Ayala, Senior Planner**

City of Ontario  
Planning Department

[REDACTED]



**Jeffrey Lambert**  
**Community Development Director**  
Community Development Department

January 23, 2020

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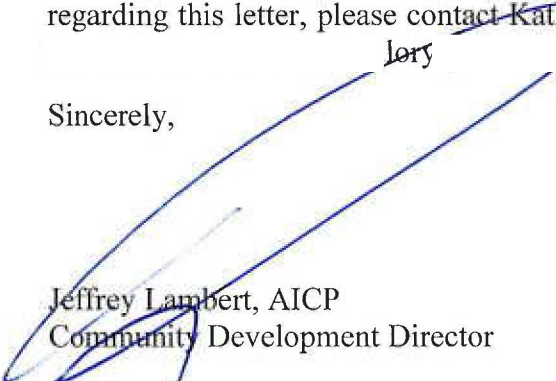
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Jeffrey Lambert, AICP  
Community Development Director

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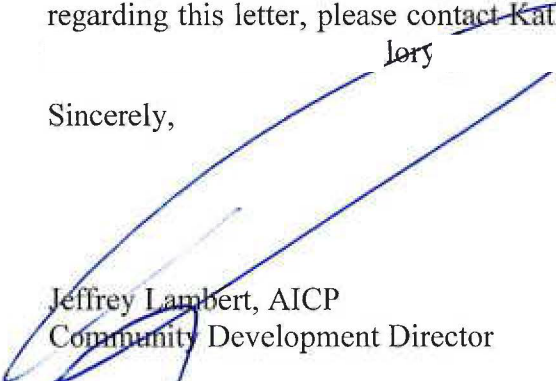
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There are two four-lane flyover (an elevated bridge over a roadway or railroad) proposals on City streets that the City has not proposed and are not identified improvements in the 2030 Oxnard General Plan: 1) Gonzales Rd/Victoria Ave. (5A0401), and Rose Ave./Gonzales Road (5A0402). The Rose Ave./Gonzales Road is especially problematic as there are numerous businesses and a hospital on the four corners and a flyover would involve expensive takings. This flyover was removed from the City's prior General Plan (2020 General Plan), as were several other street widening projects which resulted in the removal of homes or businesses. The Gonzales Rd/Victoria Ave. improvement appears to be in tandem with proposals that widen Victoria Avenue to six lanes from the Ventura city limits to Gonzales Road, within the City of Oxnard (known as projects "5A0722 and 5A0726"). The City will need to be actively involved in these projects. While we have not studied the improvements nor discussed them with our residents, we are concerned regarding the potential impact these improvements may have. Early consultation with the City is necessary.

A third major proposed highway widening is the widening of Harbor Blvd. from Oxnard city limits to Ventura city limits (known as project project "5A0720"). This description may be in error as Oxnard city limits extend to the north end of the Harbor Blvd. bridge over the Santa Clara River estuary. Does the project include widening the Harbor Blvd. bridge? That would seem to be a major undertaking given consideration of sea-level rise and sensitive habitats. The City has no position at this time on the proposed widening, we just want to make SCAG aware of significant engineering, environmental, and environmental justice concerns and ask for early consultation.

Project VEN34095, titled "In Oxnard Colonia Rd/Camino Del Sol Oxnard Boulevard (Rt 1) To Entrada Dr Construct 4 Lanes" is unknown to the City and is an incorrect reference to Rt. 1. Oxnard Blvd. has not been Rt. 1 since 2012. Widening of Colonia Rd. is essentially not possible as the community is fully developed to the existing right of way. Please delete this project from the RTP Project List.

Finally, the City does support the proposed widening of Hueneme Road to four lanes to Rice Avenue (project "VEN011202"). We urge SCAG to prioritize this project as a much-needed improvement that facilitates diverting Port of Hueneme truck traffic off of City streets and onto Rice Avenue, which is State Highway 1.

### **Avoiding Conversion of Natural and Farmland Areas**

The City welcomes SCAG's continued support for the preservation and non-conversion of Ventura County agricultural industry and natural habitat areas. Ventura County voters extended the Save Open Spaces and Agricultural Resources (SOAR) initiatives to the year 2050 that places the conversion of agricultural and open space land to urban uses with the voters, with certain exceptions. About 25% of Oxnard's economy is based on agricultural and related services.

### **Passenger Rail**

The City's questions and concerns regarding the rail operations, both commercial and passenger, were stated earlier with regard to grade separations. In general, the City supports increases in Metrolink and Amtrak services and encourages a commuter service to Santa Barbara.

COMMENTS ON THE DRAFT 2020-2045 REGIONAL TRANSPORTATION PLAN  
CITY OF OXNARD  
January 23, 2020  
Page 5

## Transit

Numerous projects and policies support the expansion of transit and improvement of the transit experience. The City works closely with GCT in planning local routes and bus stops, and with VCTC for intercity routes. As stated in general comment No. 1, the designation of the HQTA/C implies significant expansion of GCT service in the mapped area, possibly at the expense of other areas that are waiting for transit, such as service to beach areas and tourist-oriented transit. We are concerned that SCAG's emphasis on journey-to-work transit as a path to GHG and VMT reduction is preventing and discouraging other valid routes and transit applications. The efficacy of the mapped HQTA/C to reduce work trips and VMT is questionable, as the HQTA/C omits most of northeast Oxnard where most existing and over 15,000 future jobs are located. The HQTA/C does appear to include Naval Base Ventura County at its south end and link through the Ventura County Government Center, which makes sense. Again, we have not evaluated the HQTA/C designation in conjunction with GCT and reserve making additional comments.

Thank you for the opportunity to provide comments. Should you have any further questions regarding this letter, please contact Kathleen Mallory, Planning & Sustainability Manager [REDACTED] or [REDACTED] lory [REDACTED]

Sincerely,

Jeffrey Lambert, AICP  
Community Development Director

cc: Tim Flynn, Mayor  
Oxnard City Council  
Alexander Nguyen, City Manager  
Ashley Golden, Assistant City Manager  
Rosemarie Gaglione, Public Works Director  
Kathleen Mallory, Planning & Sustainability Manager



# PALMDALE

*a place to call home*

January 23, 2020

STEVEN D. HOFBAUER  
*Mayor*

RICHARD J. LOA  
*Mayor Pro Tem*

LAURA BETTENCOURT  
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JUAN CARRILLO  
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**Draft Connect SoCal Plan Comments**  
**Attn: Connect SoCal Team**  
**Southern California Association of Governments**  
**900 Wilshire Blvd., Ste. 1700**  
**Los Angeles, CA 90017**

**Re: Southern California Association of Governments, Draft Connect SoCal Plan**

Dear Connect SoCal Team:

Thank you for allowing the City of Palmdale to review and comment on the Draft Connect SoCal Plan. Please find attached Staff comments.

Please feel free to contact Senior Planner Carlene Saxton at [REDACTED] or me at [REDACTED] if you have any further questions regarding the information provided. Either of us may be reached at [REDACTED]

Sincerely,

Michael "Mike" Behen  
Acting Director of Economic and  
Community Development

cc: City Manager, J.J. Murphy  
Planning Manager, Rob Bruce  
Senior Planner, Carlene Saxton

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communication accessibility

upon 72 hours notice and request.



Letter to Connect SoCal Team  
 Draft Connect SoCal Plan Comments: City of Palmdale  
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Letter to Connect SoCal Team  
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# PALMDALE

*a place to call home*

January 23, 2020

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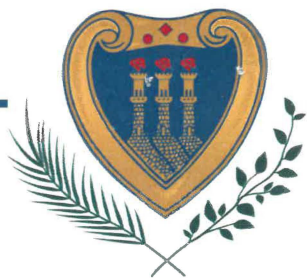
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## City of San Marino

---

PABLO

January 14, 2020

Mr. Bill Jahn, President  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, California 90017

Dear President Jahn,

The City of San Marino appreciates the opportunity to comment on the draft of the 2020-2045 Connect SoCal plan prepared by the Southern California Association of Governments.

“Huntington Drive Multimodal Capacity Enhancements” FTIP ID No. LAF7119 is in conflict with the policies previously adopted by San Marino City Council, most recently in August 2019. The project is wholly inconsistent with the City’s goals of ensuring a healthy community, safety of San Marino schools, and high quality residential neighborhoods.

Consequently, the City of San Marino objects to the project’s inclusion in the SCAG 2020-2045 Regional Transportation Plan, and requests its elimination from the Connect SoCal plan and all future iterations of the plan, as well as from the 2020-2045 Regional Transportation Plan and all future iterations of that plan.

Sincerely,

A handwritten signature in blue ink that reads "Gretchen Shepherd Romey".

Mayor Gretchen Shepherd Romey

cc: Marcella Marlowe, Ph.D., City Manager  
Michael Throne, PE, Director of Parks and Public Works/City Engineer





**CITY OF SOUTH PASADENA**  
OFFICE OF THE MAYOR



January 21, 2020

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

**Re: City of South Pasadena Draft Connect SoCal Plan Comments**

Dear Mr. Ajise,

The City of South Pasadena (City) appreciates the opportunity to review and comment on the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) and associated Programmatic Environmental Impact Report (PEIR).

In October 2019, Governor Newsom signed Assembly Bill 29 (Holden) and Senate Bill 7 (Portantino) to remove the State Route 710 (SR-710) freeway stubs located north of Interstate 10 and south of Interstate 210 from the State Highway Code. In addition, AB 29 and SB 7 declared that “any other freeway or tunnel alternative to close the Interstate 710 North Gap shall no longer be deemed as feasible alternatives for consideration in any environmental review process for the Interstate 710 North Gap Closure project...”

Furthermore, the Los Angeles County Metropolitan Transportation Authority (Metro) and California Department of Transportation (Caltrans) decision to adopt the Transportation System Management/Transportation Demand Management Alternative for the SR-710 North Project further emphasizes the fact that the SR-710 Freeway Alternative is dead. The City is pleased to see that the description for Federal Transportation Improvement Program (FTIP) project LA710NB and RTP project 1M0101 has been updated to include the TSM/TDM Alternative in the RTP project list. The City recognizes that S1120082 was included in the Strategic Plan to reflect additional projects that have been proposed as SR-710 Mobility Improvement Projects.

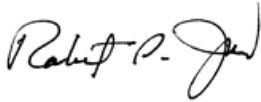
However, the City is concerned by the inclusion of FTIP/RTP project 18790 (please refer to the below table). The project is described as an “Alternative Analysis, Engineering and Environmental Studies to close 710 freeway gap...” As described, this project is contrary to the Metro and Caltrans decision to move forward with the TSM/TDM Alternative and recent state legislation deeming any freeway alternative for the SR-710 North Project as infeasible.

<u>FTIP ID</u>	<u>RTP ID</u>	<u>Description</u>	<u>Project Cost</u> <u>(\$1,000's)</u>
LA710NB	1M0101	SR RT. 710 North - Transportation System Management (TSM) & Transportation Demand Management (TDM) as identified in the EIR/EIS	\$111,000
18790	18790	Route 710: Study to perform Alternative Analysis, Engineering and Environmental Studies to close 710 freeway gap (EA# 18790, PPNO# 2215)	\$70,454
	S1120082	SR-710 Transportation Improvement Options	Strategic Plan

To ensure consistency with state legislation and the Metro and Caltrans decision to move forward with the TSM/TDM Alternative the City requests that project 18790 be removed from the RTP project list.

If you have any questions or comments, please feel free to contact Margaret Lin, Manager of Long Range Planning and Economic Development, at [REDACTED] or [REDACTED]

Sincerely,



Robert S. Joe  
South Pasadena Mayor

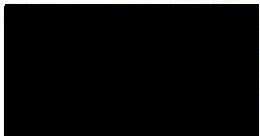
cc: South Pasadena City Council





# CITY OF WEST HOLLYWOOD

CITY HALL



**OFFICE OF THE CITY MANAGER**

**CITY MANAGER**

January 23, 2020

Roland Ok  
Senior Regional Planner  
Southern California Association of Governments  
900 Wilshire Blvd, Ste 1700  
Los Angeles, CA 90017

RE: Southern California Association of Governments Connect SoCal – Draft Plan Comments

Dear Mr. Ok:

Thank you for the opportunity to provide input on the Draft Connect SoCal plan.

The City of West Hollywood is supportive of the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) vision to promote sustainable development in the region.

To that end, the City of West Hollywood encourages SCAG to actively support our ongoing work with Metro and the City of Los Angeles to accelerate delivery of the Northern Extension of the Crenshaw/LAX transit line through some of the densest and most congested parts of the region including Mid City Los Angeles, West Hollywood, and Hollywood. The Northern Extension project will transform regional mobility by forming a new north-south regional connector enabling tens of thousands of transit riders to avoid the need to travel downtown to transfer by linking five existing Metro Rail lines from the South Bay to the San Fernando Valley. This level of connectivity and access to opportunity will benefit several underserved communities; link countless major employment, entertainment, medical, and cultural centers; and generate ridership in excess of 90,000 daily riders—higher than any light rail line in the Country.

Because of these and other project benefits, the Northern Extension project will help the region achieve the RTP's stated goals of reducing greenhouse gas emissions and vehicle miles travelled while locating employment and density near transit.





CITY OF  
WEST HOLLYWOOD

In addition, the City of West Hollywood has revisions to the Draft Technical Report Project List:

- FTIP ID LAF9623 – This project is Phase I in a multiphase design district program including several other projects that should also be included. See enclosed Attachment 1 for a revised list of projects to be included in the final RTP/SCS.
- FTIP ID LA0G1052 – Remove this project as Metro has selected and is constructing an alignment along Wilshire Boulevard.
- Attachment 1 includes a revised list of additional projects to be included in the Final RTP/SCS to reflect our upcoming transportation investments.

If you have any questions, please contact Bob Cheung, Senior Transportation Planner, Long Range Planning Division at (323) 848-6346 or at [bcheung@weho.org](mailto:bcheung@weho.org).

Sincerely,

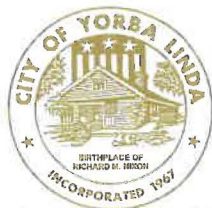
JOHN LEONARD  
Community and Legislative Affairs Manager  
City of West Hollywood

Enclosures:

Attachment 1: Revised List of Additional Projects to be Included in the Final RTP/SCS

City	Project Title	Project Description	Spot Project or Corridor Project	Extent 1	Extent 2	Additional Geographic Information	Funding Status	Budgeted Cost	Anticipated Completion Year
West Hollywood	Fountain Ave. Pedestrian Improvements	High visibility crosswalks, Enhancement of existing crosswalks, Landscaping and streetscaping, Crossing RRFB, lighting, left-turn prohibition, Signal timing adjustments (leading pedestrian intervals/protected left turn phases), Traffic calming (buffer striping and parking lane planters), Curb extensions	Corridor	Harper Ave. San Vicente Blvd. San	Detroit St. Croft Ave.	Key interventions at Harper Ave., Hayworth Ave., Formosa Ave, and Detroit St.	No dedicated funding	\$9,130,000	<5 years
West Hollywood	DD Streetscape Phase I	Melrose Complete street upgrades: bulbouts, crosswalk enhancements, sharrows, landscaping and tree canopy, street furniture, sidewalk upgrades, lighting upgrades, public wifi and fiber optic (Sharrows portion est. \$34,000)	Corridor	San Vicente Blvd. San	Doheny Dr.		43% funded through a \$3.2 M Metro Grant	\$7,000,000	2021
West Hollywood	DD Streetscape Phase IV	Streetscapes - Melrose: San Vicente to Doheny, La Peer: SMB to Melrose, Almont: SMB to Melrose, & Robertson: Melrose to SMB (same treatments as Melrose Phase I)	Corridor(s)	San Vicente Blvd. San	Doheny Dr.	Includes multiple streets	Some funding will be secured from 8899 Beverly and Robertson Lane public benefits	\$7,000,000	2023
West Hollywood	DD Streetscape Phase VI	Beverly and Robertson South Complete street upgrades: Class II Bike Lane (Beverly, est. \$54,000), Sharrows (Robertson, est. \$17,000) bulbouts, crosswalk engagements, landscaping and tree canopy, street furniture, sidewalk upgrades, lighting upgrades, public wifi and fiber optic	Corridor	San Vicente Blvd. San	Doheny Dr.		14% funded with \$1 M from 8899 Beverly public benefit	\$6,000,000	2025
West Hollywood	Mobility Hubs Citywide Unsignalized Crosswalk In-roadway Warning Lights	Planning for 3 mobility hubs in the city	Spot(s)			Includes two streets Multiple sites citywide	No dedicated funding	\$750,000	
West Hollywood	Almont Dr: North/South Greenway	Install in-roadway warning lights at all unsignalized crosswalks citywide and x new crosswalks. (15 total)	Spot(s)			Multiple sites citywide	No dedicated funding	\$450,000	<5 years
West Hollywood	Greenway	Three pedestrian crossing upgrades (unsignalized to RRFB): San Vicente Blvd & Library/PDC, San Vicente Blvd & Harratt St, La Cienega Blvd & Rosewood Ave. Six bicycle crossings: Holloway Dr & Palm Ave, Fairfax Ave & Willoughby Ave, Fountain Ave & Formosa Ave, La Cienega Blvd & Rosewood Ave	Corridor	Santa Monica Blvd.	Beverly Blvd.		No dedicated funding. Cost shown from BPMP, total cost for all Weho Greenways now anticipated to be \$2,019,600	\$440,000	>5 years
West Hollywood	Pedestrian and Bicycle Crossing Improvements		Spot(s)			Multiple sites citywide	No dedicated funding	\$423,000	
West Hollywood	Willoughby Ave: East/West Greenway	Greenway Gap closure between existing Class II bike lanes in Beverly Hills and West Hollywood by cutting back the median island on one side and relocating drainage, ramps, new high visibility green paint, etc.	Corridor	La Cienega Ave.	La Brea Ave.	60% LA 40% Weho	No dedicated funding. Cost shown from BPMP, total cost for all Weho Greenways now anticipated to be \$2,019,601	\$370,000	<5 years
West Hollywood	Santa Monica Blvd. Bike Lane		Spot	Almont Dr.	Doheny Dr.	Closes only remaining gap from West LA to Kings Rd	No dedicated funding	\$250,000	2020
West Hollywood	Transit Screens	Install screens that display transit information at 2 outdoor locations and 5 indoor locations.	Spot(s)			Multiple sites citywide	No dedicated funding	\$220,500	
West Hollywood	Gardner Street/Vista Street Neighborhood Greenway		Corridor	Fountain Ave. Santa Monica Blvd. Sunset Blvd.	Willoughby Ave. Beverly Blvd. Santa Monica Blvd.		No dedicated funding. Cost shown from BPMP, total cost for all Weho Greenways now anticipated to be \$2,019,602	\$150,000	>5 years
West Hollywood	Westbourne Dr. Bike - friendly traffic diverters	Bike -friendly traffic diverters (2: North of Santa Monica and Beverly Blvd.)	Corridor	Sunset Blvd.	Beverly Blvd. Santa Monica Blvd.		No dedicated funding	\$50,000	<5 years
West Hollywood	Holloway Dr. Bike Lane	Install Class II Bike Lane	Corridor			City Limits	No dedicated funding	\$45,000	>5 years
West Hollywood	Romaine St. Sharrows	Install Class III Bikeway (Sharrows)	Corridor				No dedicated funding	\$34,000	<5 years
West Hollywood	Crescent Heights Blvd. Uphill Bike Lane	Install Uphill Class II bike lane/downhill Class III bikeway (sharrows)	Corridor	Santa Monica Blvd.	Sunset Blvd.		No dedicated funding	\$31,000	>5 years
West Hollywood	Bicycle Parking	Installing additional racks (20) and lockers (10) citywide	Spot(s)			Multiple sites citywide	No dedicated funding	\$25,600	
West Hollywood	San Vicente Blvd. Uphill Bike Lane	Install Uphill Class II bike lane/downhill Class III bikeway (sharrows)	Corridor	Santa Monica Blvd. Sunset Blvd.	Sunset Blvd. Holloway Dr.		No dedicated funding	\$25,420	>5 years
West Hollywood	Bike Friendly Traffic Diverters	Bike -friendly traffic diverter (1 between Sunset Blvd. and Holloway Dr.)	Corridor	Sunset Blvd.	Holloway Dr.		No dedicated funding	\$25,000	<5 years
West Hollywood	Hilldale Ave. Bike -friendly traffic diverter	Bike -friendly traffic diverter (1 just south of Sunset Blvd.)	Corridor	Sunset Blvd.			No dedicated funding	\$25,000	<5 years
West Hollywood	Huntley Dr. Bike -friendly traffic diverter	Bike -friendly traffic diverter (1 at Beverly Blvd.)	Corridor	Sunset Blvd.	Beverly Blvd.		No dedicated funding	\$25,000	<5 years
West Hollywood	Olive Dr. Bike -friendly traffic diverter	Bike -friendly traffic diverter (1 between Sunset Blvd. and Fountain Ave.)	Corridor	Sunset Blvd.	Fountain Ave. Santa Monica Blvd.		No dedicated funding	\$25,000	<5 years
West Hollywood	Doheny Dr. Sharrows	Install Class III Bikeway (Sharrows)	Corridor	Cynthia St. San	Monica Blvd. Beverly Hills	Coordiante With LA and Beverly Hills	No dedicated funding	\$23,800	>5 years
West Hollywood	Cynthia St. Bike Lane	Install Class II Bike Lane	Corridor	Doheny Dr. Cynthia St.	Vicente Blvd. Sunset Blvd.		No dedicated funding	\$22,500	>5 years
West Hollywood	Doheny Dr. Uphill Bike Lane	Install Uphill Class II bike lane/downhill Class III bikeway (sharrows)	Corridor	Santa Monica Blvd. Romaine St.			No dedicated funding	\$13,640	>5 years
West Hollywood	Bicycle Repair Facilities	Bicycle repair facilities at 5 locations	Spot(s)			Multiple sites citywide	No dedicated funding	\$10,000	
West Hollywood	Crescent Heights Blvd. Sharrows	Install Class III Bikeway (Sharrows)	Corridor				No dedicated funding	\$8,500	>5 years
West Hollywood	Santa Monica Blvd. Bike Lane High Visibility Markings	Install High Visibility Markings and Conflict Striping from Doheny to Kings	Corridors	Doheny Dr.	Kings Rd.		No dedicated funding		<5 years
West Hollywood	Fairfax Ave. Bike Line High Visibility Markings	Install High Visibility Markings and Conflict Striping	Corridors				No dedicated funding		
West Hollywood	San Vicente Blvd. Bike Lane High Visibility Markings	Install High Visibility Markings and Conflict Striping	Corridors				No dedicated funding		
West Hollywood	Gardner St./Vista St. Bike Lane	Install Class II Bike Lane	Corridor	Fountain Ave.	Willoughby Ave.	Will also include Greenway elements	No dedicated funding		<5 years

City	Project Title	Project Description	Spot Project or Corridor Project	Extent 1	Extent 2	Additional Geographic Information	Funding Status	Budgeted Cost	Anticipated Completion Year
West Hollywood	CNE Local Match	Local match for First/Last Mile improvements associated with new rail stations: minimum 3% match for Metro's Crenshaw line extension through West Hollywood. First/Last mile improvements are primarily pedestrian and bicycle amenities.	Spot(s)			Multiple sites citywide	No dedicated funding	\$66,000,000	
West Hollywood	Transit Expansion	Expand the PickUp Line, CityLine Commuter and CityLine Local services through procurement of additional vehicles.					No dedicated funding	\$17,009,485	
West Hollywood	Smart Parking Meters (real time pricing)	Implement an on-street intelligent parking program that includes dynamic demand-based pricing.	Corridors(s)			Citywide	No dedicated funding	\$6,790,000	
West Hollywood	On-demand transit pilot project (microtransit)	Plan and implement a one-year pilot program including procurement of vehicle and associated technology resources, and evaluation of pilot.					No dedicated funding	\$4,300,000	
West Hollywood	Smart Streetlights	Upgrade traditional street lights by deploying new, energy-efficient street lights with sensors that collect data to measure curbside activity (parking), pedestrian and bicycle activity, and vehicle activity	Corridors(s)			Multiple sites citywide	No dedicated funding	\$2,100,000	
West Hollywood	Comprehensive right-of-way & curbside management pilot program	Implement a curbside management pilot program to manage the curbside right-of-way. Melrose Gathering Space: convert excess travel lane and angled parking to pocket park, street amenities, and public art	Corridors(s)			Citywide	No dedicated funding	\$1,874,400	
West Hollywood	DD Streetscape Phase II	Beverly Gathering Space: convert City parking lot to pocket park, street amenities, and public art	Spot	Norwich Ave.	Huntley Dr.	May be extended 1 block	No dedicated funding	\$1,000,000	2021
West Hollywood	DD Streetscape Phase VII	Signal timing upgrades (N/S coordination, real time dynamic TMC)	Spot	Robertson Blvd.	Bonner Dr.		100% funded with \$1 M from 8899 Beverly public benefit	\$1,000,000	2025
West Hollywood	EV Infrastructure & Charging	Construction of 8 on-street EV charging stations.	Spot(s)			Multiple sites citywide	No dedicated funding	\$660,000	
West Hollywood	V2X Connected Vehicle Infrastructure	Install Bluetooth technology at 25 intersections in the city as connected vehicle infrastructure.	Spot(s)			Multiple sites citywide	No dedicated funding	\$542,200	
West Hollywood	City Bus Services Electrification	Upgrade City transit services (CityLine, CityLine X, Weho Pick Up, Sunset Trip) to electric vehicles and install necessary charging infrastructure.				Multiple sites citywide	No dedicated funding	\$267,150	2030



# CITY OF YORBA LINDA

January 21, 2020

Kome Ajise  
 Executive Director  
 Southern California Association of Governments  
 900 Wilshire Boulevard, Suite 1700  
 Los Angeles, California 90017

**Subject: Comments on Draft Connect SoCal Plan and PEIR**

Dear Mr. Ajise:

The City of Yorba Linda appreciates the opportunity to review and provide feedback on the draft Connect SoCal Plan and its accompanying Program Environmental Impact Report (PEIR). We especially appreciate the opportunity SCAG provided through the Bottom-Up Local Input and Envisioning Process during 2017-2018. We recognize the significant amount of time, effort, and coordination it takes to put together a plan of this magnitude. Our primary concern with the Connect SoCal Plan is its inconsistency with the draft Regional Housing Needs Assessment (RHNA).

Specifically, the City offers the following public comments on Connect SoCal and its PEIR. We recognize that some of our comments are directly related to the draft RHNA methodology; however, we believe that these comments are relevant to Connect SoCal since SB 375 requires that SCAG "identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584." We also recognize that although neither Connect SoCal nor the RHNA have been adopted, as proposed these two plans will be inconsistent with one another. This is significant because Government Code 65584.04(m) requires that RHNA "allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy."

- 1) The growth and need forecasted in RHNA is dramatically inconsistent with the draft Connect SoCal growth forecast. Section 3.14.1.1 of the draft PEIR defines *household* as "all the people who occupy a housing unit." This definition includes related and unrelated persons sharing a housing unit, including individuals living in overcrowded conditions. Table 14 of the Demographics and Growth Forecast Technical Report identifies a projected household growth for the City of Yorba Linda of 900 households between 2016 and 2045 (or 31 households per year). However, the draft RHNA projects the need for an additional 2,322 housing units between 2021 and 2029 (290 housing units per year). If RHNA is supposed to be consistent with the development pattern of Connect SoCal and SCAG only

Draft Connect SoCal Plan and PEIR Comment Letter  
January 21, 2020

projects an additional approximately 250 households (31 units x 8 years) over the eight-year RHNA period for the City of Yorba Linda, why would RHNA project the need for 2,322 housing units over the same eight-year period? Even if it is assumed that all 900 projected households from Connect SoCal would happen by 2029, why would RHNA project the need for 2,322 housing units?

Furthermore, according to the 2019 Department of Finance Population and Housing Estimates, the City of Yorba Linda has 861 vacant housing units (3.6% vacancy rate). The City could easily accommodate the projected household growth of 250 households over the eight-year RHNA period through its existing vacant housing units and still have over 600 vacant housing units available without constructing any additional housing units. In other words, the proposed RHNA would essentially require the City to construct an additional 2,322 housing units plus utilize its 861 vacant housing units (a total of 3,183 housing units) to accommodate a projected population growth of 1,644 people and a projected household growth of 250 for the eight-year RHNA period. This is in direct conflict with Government Code Section 65080(b)(2)(B) and Government Code Section 65584.04(m) that require that Connect SoCal and RHNA be consistent with one another. Ironically, it is actually the SCAG staff recommended RHNA methodology from November 7, 2019, that much more closely aligns with the growth forecast and development pattern found within the Connect SoCal Plan.

- 2) It is also important to point out that Section 3.14.1.2 (Existing Population, Housing, and Employment) of the draft PEIR identifies four guiding principles that were not properly updated to reflect the latest draft from the October 17, 2019 Technical Working Group (TWG). The first principle should state, "The preferred scenario will be adopted at the jurisdictional level, and directly reflects the population, household and employment growth projections that have been reviewed and refined with feedback from local jurisdictions through SCAG's Bottom-Up Local Input and Envisioning Process. The preferred scenario maintains these locally informed projected jurisdictional growth totals, meaning future growth is not reallocated from one local jurisdiction."

The draft RHNA differs from the Connect SoCal growth forecast. As proposed, the projected household growth from Connect SoCal will be redistributed from one jurisdiction to another through the RHNA methodology, which conflicts with SCAG's guiding principle of not reallocating growth from one jurisdiction to another.

- 3) Sections 3.11.2.2 and 3.14.2.2 of the PEIR are incorrect in the explanation of RHNA. Pages 3.11-33 and 3.14-14 both state, "***The RHNA does not necessarily encourage or promote growth***, but rather allows communities to anticipate growth and address existing need, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment." Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and



counties should undertake all necessary actions to **encourage, promote, and facilitate the development of housing** to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the five objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).

- 4) Pages 3.11-33 and 34 and page 3.11-15 of the PEIR state, “Per SB 375, the **projected need’s portion** of the 6<sup>th</sup> Cycle RHNA will be consistent with the Connect SoCal for the comparable period.” SB 375 requires that the RHNA, which includes both existing and projected housing need, be consistent with the Connect SoCal for the comparable period (see Government Code Section 65584.04(m)). RHNA should “allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy.” Please revise the explanation to state that the RHNA (including existing and projected need) will be consistent with the Connect SoCal.
- 5) Page 3.14-16 of the draft PEIR states, “The SCS must accommodate the **projected need portion** of the 6<sup>th</sup> Cycle RHNA.” This statement is misleading in that Government Code 65080 states that the SCS must “identify areas within the region sufficient to house an eight-year projection of the regional housing need [existing **and** projected need] for the region.” The PEIR also states, “While the existing housing need portion of the 6<sup>th</sup> cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.” While the development pattern for the projected need portion of the RHNA (approximately 505,000 housing units) is clearly outlined in the PEIR and Connect SoCal Plan, the development pattern for the remaining approximately 835,000 housing units for “existing need” (approximately 62% of the total housing need) is not addressed in any specificity in the PEIR. For the City of Yorba Linda, it is completely unreasonable to assume that 2,322 new housing units are necessary to accommodate approximately 250 households through the upcoming RHNA cycle, or even to accommodate 900 households through 2045.
- 6) If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, the RHNA methodology is a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing. The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations. Therefore, wouldn’t the draft RHNA methodology need to be evaluated as a reasonable alternative within the PEIR?

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- 7) Exhibit 1 of the Sustainable Communities Strategy Technical Report is described as "the growth vision and the forecasted regional development pattern." This exhibit is confusing and needs a better explanation. For example, do darker shades of blue represent higher priority growth areas?
- 8) Page 48 of the draft Connect SoCal Plan describes "absolute constraint areas" but the term is not defined within the glossary. Please include a definition for this term.
- 9) Several exhibits throughout the Plan and Technical Reports show the I-5 corridor between Anaheim and Mission Viejo as a High Quality Transit Area (HQTA); however, that corridor does not currently have any HQTA. Furthermore, the proposed Bus Rapid Transit (BRT) has not even had specific stop locations identified or evaluated by Orange County Transportation Authority (OCTA). Therefore, referring to the entire corridor as a HQTA is not appropriate. Please remove this from all exhibits.
- 10) The City also supports the comments made by the Orange County Council of Governments and Cal State Fullerton's Center for Demographic Research.

The City recognizes and appreciates the time and effort provided by everyone on this important and complex issue and for your consideration of these items. As far as we understand, this will be considered by the Regional Council on March 5, 2020. We also understand that at this same meeting the Regional Council will be discussing the RHNA methodology and RHNA appeals procedures. It is absolutely imperative that there is sufficient time for the Regional Council to discuss any questions or concerns with the Plan and its PEIR as well as the RHNA methodology and appeals. In order to avoid another rushed meeting agenda where Regional Council members are denied the opportunity to ask questions and provide comment, we strongly encourage SCAG to either reschedule the RHNA discussion to another date or extend the length of the meeting. Please let me know if you need any additional clarification or have any questions by contacting me at [REDACTED] or [REDACTED].

Sincerely,



David Brantley  
Community Development Director

cc: Mark Pulone, City Manager  
Nate Farnsworth, Principal Planner  
Deborah Diep, Center for Demographic Research



Innovate. Advocate. Achieve. Together.

January 23, 2020

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

Re: Aerial Rapid Transit - SUPPORT

To Whom It May Concern:

The Draft Connect SoCal plan continues the work Southern California Association of Governments (“SCAG”) began in 2011 with the development and eventual adoption of its first combined Regional Transportation Plan/Sustainable Communities Strategy (“RTP/SCS”) in 2012, and an update adopted in 2016. Those two precedent documents provided an assessment of our region’s ability to meet its greenhouse gas emission reduction targets. However, as the Connect SoCal plan (“Plan”) makes clear:

“...we may potentially fall short of our 2020 target for greenhouse gas emission reductions, the core metric by which our region’s sustainability is judged. Transit ridership is falling, despite billions of dollars in investment and increased development in station areas.”

Indeed, despite billions in capital spending transit ridership continues to fall and automobile ownership continues to rise. Yet, strategically, there are examples of projects that embody the needed connectivity and choice ridership the Plan calls for:

“...our 2018 transit ridership study with the University of California Los Angeles Institute of Transportation Studies found that if one out of every four people (who rarely ride transit) took transit just twice a month, it would more than make up for the region’s lost ridership.”

One of the “Key Connections” moving forward in our region is the Aerial Rapid Transit (“ART”) project, the aerial gondola that will connect Los Angeles Union Station (the region’s transportation hub) to Dodger Stadium and the surrounding communities and environs. This fully privately funded project is truly the “...intersection of land use, transportation and technology...” SCAG calls upon to “...close the gap and reach our greenhouse gas reduction goals.”

The ART can carry 5,000+ people per hour per direction on this transit system and can do so quietly and without carbon emissions as the ART is electric, and located in LADWP service territory which is rapidly moving to 100% renewable sources. The ART sponsor, Aerial Rapid Transit Technologies LLC

("ARTT") is fully funding the ART and has entered into an agreement with the Los Angeles County Metropolitan Transportation Authority ("Metro") to process environmental clearance for the Project. Under the current timetable, the ART can be operational by 2023 and anticipates removing over 3,000 cars from Dodger Stadium events. That equates to a roughly 20-25% reduction in existing automobile trips per average Dodger Stadium event.

The ART will also provide presently non-existent transit access to surrounding communities and to a major recreational asset in this part of the region: Elysian Park. Indeed, the ART is a proven technology, is "clean and green", and provides a prototypical opportunity for replication in certain parts of the SCAG region where connectivity and access are lacking. It is, indeed, one tool in our toolkit that should not be ignored and specifically referenced in the Connect SoCal plan.

Finally, based on SCAG's criteria for a Transit Priority Area ("TPA") and for a High Priority Transit Area ("HPTA") of a fixed-guideway, high-capacity transit stop, the ART to Dodger Stadium meets the definitional criteria of both TPA and HPTA given the direct connection of the ART to Union Station. Moreover, when coupled with the extension of the Figueroa Street multi-modal (transit, bicycle, pedestrian) corridor north to Dodger Stadium that is already included in the RTP per amendment submitted by Metro, this further underscores the viability of both expanded TPA and HPTA designations. More and more, our sports and entertainment venues need to be viewed with an eye towards multi-modality and land use/transportation integration as they are major opportunities to address the choice rider.

Last, we wish to include an illustration, see attachment, which presents two future visions of Los Angeles. One scenario projects a city cursed with extreme heat and rotting infrastructure, while the other is lively, pedestrian and park friendly, with aerial rapid transit deployed as a means to moving Angelenos around the region. We hope SCAG selects this more hopeful vision.

In sum, Climate Resolve urges that the ART be profiled in the Connect SoCal plan as an innovative connector, and that the TPA and HPTA designations apply to the property.

Sincerely,



Jonathan Parfrey  
Executive Director

p.s. Climate Resolve is submitting three letters on the Draft Connect SoCal Plan. We have segmented them for ease of comprehension. The other two letters concern 1) annotated comments on chapter 3.8 on greenhouse gasses, and 2) a comprehensive multi-party group letter.

ATTACHMENT





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## PUBLIC PARTICIPATION AND CONSULTATION

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APPENDIX 3B  
COMMENT LETTERS CI - CL

[connectsocial.org](http://connectsocial.org)