



## CHAPTER 5

# Other CEQA Considerations

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- 5.1 Significant Environmental Effects of Plan Implementation That Cannot Be Avoided
- 5.2 Significant Irreversible Environmental Changes
- 5.3 Growth-Inducing Impacts

This chapter presents a discussion of the significant environmental effects of the Plan, significant irreversible changes resulting from implementation of the Plan, and growth-inducing effects of the Plan as required by the California Environmental Quality Act (CEQA). More specifically, CEQA Guidelines Section 15126 states that an Environmental Impact Report (EIR) must include a discussion of the following topics:

- Significant environmental effects which cannot be avoided if the proposed project is implemented.
- Significant irreversible environmental changes which would be involved in the proposed project should it be implemented.
- Growth-inducing effects of the proposed project.

In addition, CEQA Guidelines Section 15128 requires a brief statement of the reasons that various possible effects of a project have been determined not to be significant and, therefore, are not discussed in detail in the EIR. This 2024 PEIR analyzed all potential effects of the Project (Connect SoCal 2024 or the Plan), as described in CEQA Guidelines Appendix G. There is no listing of effects which are determined not to be significant.

## 5.1 SIGNIFICANT ENVIRONMENTAL EFFECTS OF PLAN IMPLEMENTATION THAT CANNOT BE AVOIDED

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. This 2024 PEIR provides a programmatic analysis of the regional impacts expected to occur from implementation of the transportation projects (approximately 2,000 projects) and the policies and strategies identified in the Plan. As described in Chapter 2, *Project Description*, the Plan seeks to encourage and facilitate growth in Priority Development Areas (PDAs) and minimize growth in Green Region Resource Areas (GRRAs) that warrant protection. Nonetheless, given the long-term nature of the Plan (a minimum of 20 years), the potential magnitude, scale, and distribution of possible changes during the lifetime of the Plan, the unforeseeable nature of specific projects and circumstances, and limitations in the degree of specificity, this 2024 PEIR conservatively and reasonably identifies all environmental impacts as significant, except for two specific issues: (1) Plan's consistency with federal transportation conformity for Air Quality and (2) Plan's consistency with SB 375 for Greenhouse Gas Emissions.<sup>1</sup>

To address these significant impacts, the PEIR identifies SCAG mitigation measures as well as project-level mitigation measures which can and should be considered by lead agencies to reduce impacts of individual projects as appropriate and feasible. Implementation of the Plan, including Regional Planning Policies and Implementation Strategies as features of the Plan, compliance with all applicable laws and regulations, and implementation of mitigation measures would still result in significant and unavoidable project-related and/or cumulative impacts in the following areas:

- **Aesthetics:** Implementation of the Plan may result in the conversion of open space or vacant lands to new uses. Areas potentially affected include designated open space visible from United States Forest Service, California Department of Transportation (Caltrans), county, and city designated scenic vistas. The Plan would also have the potential to impact rock outcroppings or other scenic elements such as historic resources within

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<sup>1</sup> Table ES-5, Summary of Project Impacts, Mitigation Measures, and Residual Impacts, which is contained in the *Executive Summary* of this 2024 PEIR, and Sections 3.1 through 3.20 of this 2024 PEIR provide a comprehensive evaluation and disclosure of the environmental effects of the Plan, including the level of significance both before and after implementation of mitigation measures.

eligible state scenic highways. Many of the transportation projects and PDAs are in areas with designated scenic resources including historic buildings and scenic rock outcroppings. Therefore, there is potential for the Plan to affect these resources. Implementation of the Plan has the potential to degrade the visual character of project sites, constituting a significant impact. Implementation of the Plan also has the potential to create new substantial sources of light or glare, constituting a significant impact.

- **Agriculture and Forestry Resources:** Implementation of the Plan would have the potential to convert the following to non-agricultural use: Prime Farmland, Farmland of Statewide Importance, Unique Farmland and Farmland of Local Importance. Implementation of the Plan would have the potential to conflict with land managed pursuant to Williamson Act contracts and existing zoning for forest land, timberland, or timberland zoned Timberland Production. Implementation of the Plan would also result in significant impacts with regards to the loss of forest land or conversion of forest land to non-forest use, and with regards to the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.
- **Air Quality:** Implementation of the Plan will result in impacts to air quality. At the regional level, criteria pollutant emissions would be mostly substantially reduced compared to existing conditions and the region would meet air quality standards. In 2050, when compared to existing conditions, on-road mobile-source particulate matter ten microns or less in diameter (PM10) would increase in Imperial, Riverside, and San Bernardino Counties due to increasing vehicle miles traveled. On-road mobile-source particulate matter emissions would remain the same or decrease from existing conditions in the other counties. Within the South Coast Air Basin (SCAB) (which is likely indicative of the region as a whole), Southern California Air Quality Management District (SCAQMD) indicates that total pollutant emissions are being reduced through at least 2031, except for small increases in SOx and PM2.5. Individual project emissions may result in significant construction and/or operational emissions as compared to thresholds of significance identified by each air district. Over the lifetime of the Plan, implementation of the numerous transportation projects and land use strategies identified in the Plan could expose sensitive receptors to substantial pollutant concentrations.

In accordance with the *Sierra Club v. County of Fresno* (i.e., *Friant Ranch*) decision, when air quality impacts are found to be significant, the health implications of the significant emissions should be disclosed. Modeling and analyzing health consequences requires a substantial amount of data. A detailed health risk assessment of on-road mobile-source emissions was undertaken for the Plan. Connect SoCal 2024 would provide strategies to improve public health and develop walkable and transit friendly communities. The cancer risk adjacent to freeways would be significantly reduced when compared to existing conditions. The Plan would not exacerbate the health risk compared to existing conditions and therefore the impact of on-road emissions is less than significant. As discussed in Section 3.3, *Air Quality*, construction activity would occur adjacent to sensitive receptors. The significant construction emissions identified in Impact AQ-2, could result in an adverse health effects to sensitive receptors. As such, it is likely that extended intense construction activities (e.g., from development projects that involve a high volume of haul trucks) would exceed the health risk significance thresholds due to equipment and truck exhaust emissions. This is considered a significant impact related to substantial pollutant concentrations during construction activities.

- **Biological Resources:** Implementation of the Plan could impact biological resources. Direct impacts that could occur include direct loss of sensitive plant and/or wildlife species resulting from injury, death, or disturbance of these species. Direct impacts may also occur through direct habitat loss and fragmentation during construction, displacement of sensitive species due to construction noise or during operation, accidental introduction of non-native plants by construction equipment or during maintenance and general operation, introduction of new lighting sources, and dust and noise during construction and operation. Implementation of the Plan would also have a substantial adverse effect on riparian habitats and other

sensitive natural communities, as well as on wetlands. Implementation of the Plan would interfere substantially with the movement of native resident or migratory fish, or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites directly, as a result of habitat conversion to accommodate potential projects, or indirectly through interruption of movement or migratory corridors caused by construction and operation of infrastructure for transportation projects and adjacent projects that may result from improved transportation access. Implementation of the Plan has the potential to conflict with local policies and ordinances related to biological resources and a potential to result in conflicts with the provisions of applicable adopted Habitat Conservation Plans (HCPs) and Natural Community Conservation Plans (NCCPs) because some planned transportation and development projects may occur in or adjacent to lands protected under these plans, constituting a significant impact.

- **Cultural Resources:** Implementation of the Plan has the potential to effect historical resources in the SCAG region, including sites listed in the NRHP. Implementation of the Plan has the potential to cause a substantial adverse change in the significance of archaeological resources in the SCAG region, pursuant to CEQA Guidelines Section 15064.5, constituting a significant impact. Implementation of the Plan also has the potential to disturb human remains interred outside of formal cemeteries or those interred in Native American sacred sites, constituting a significant impact.
- **Energy:** Implementation of the Plan has the potential to result in wasteful, inefficient, or unnecessary energy consumption in the SCAG region. Implementation of the Plan has the potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, constituting a significant impact.
- **Geology and Soils:** Implementation of the Plan could result in significant impacts regarding fault rupture, ground shaking, landslides, subsidence, lateral spreading, liquefaction and other seismically induced ground failure, and erosion and loss of topsoil. The potential direct impacts on paleontological resources related to implementation of the Plan could result in substantial alteration or removal of a significant paleontological resource from construction activities, and is considered significant.
- **Greenhouse Gas Emissions (GHG):** Implementation of the Plan may result in impacts to GHG emissions. While one of the primary objectives of Connect SoCal 2024 is to reduce GHG emissions, and the Plan has met its regional GHG target pursuant to SB 375, given the regional scale of the analysis, number and variety of transportation projects included in the Plan, the variety of transportation and land use strategies, implementation of the Plan could conflict with AB 32 and SB 32 and other applicable plans, policies or regulations adopted for the purpose of reducing emissions of GHGs. Furthermore, while GHG emissions are anticipated to decrease compared to existing conditions, they are not anticipated to be reduced sufficiently to meet the statewide GHG emissions reduction targets and GHG emissions resulting directly and indirectly from the Plan may result in significant and unavoidable impacts. Therefore, GHG impacts, with the exception of the Plan's compliance with SB 375, are conservatively considered significant and unavoidable.
- **Hazards and Hazardous Materials:** Implementation of the Plan could increase the risk of significant hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials as well as through reasonably foreseeable upset conditions. Implementation of the Plan may increase the risk of emitting hazardous materials within one-quarter mile of a school. Furthermore, the Plan may result in the development of sites included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The Plan would not in itself result in a safety hazard; however, increased population growth that would occur by 2050 would result in increased air traffic in major commercial airports in Southern California which could result in significant safety impacts. The Plan would result in significant impacts related to emergency access, and implementation or interference with an adopted emergency response plan or emergency evacuation plan.

- **Hydrology and Water Quality:** Implementation of the Plan may result in impacts to water quality due to erosion resulting from exposed soils that may be transported in stormwater runoff. Given that most of the groundwater basins in the Plan area are already in a state of overdraft, future development may result in a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted). Implementation of projects under the Plan would occur within watersheds that have impaired water bodies. Many of the impaired water bodies are located near freeway, transit, or rail projects included in the Plan. Several projects may impact water bodies by placing fill material within a stream channel. The Plan has the potential to change existing drainage patterns. Transportation projects such as lane widening projects, new highways, as well as bridges/tunnels, and transportation facilities projects that could cross existing creeks, water crossings, rivers or be expanded into wetland areas may impact water bodies by placing fill material within a stream channel. The Plan has the potential to alter existing drainage patterns. Implementation of the Plan may increase impervious surfaces, which in turn could increase urban runoff if not regulated, resulting in the transport of greater volumes of polluted water into storm drain systems. With regard to flooding, transportation projects and land use development built in low-lying areas or in proximity to waterways and/or dam inundation zones may be subject to flood hazards. An increase in impervious surfaces would increase water runoff and potentially affect groundwater recharge rates and water quality in the basins. Therefore, the Plan may conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan and mitigation measures are required.
- **Land Use:** Implementation of the Plan may result in the physical division of an established community which could occur as a result of real or perceived barriers to pedestrians, bicyclists, and motorists. Short-term construction related impacts could result from disturbances due to construction equipment; these impacts are discussed under other impact categories (e.g., Noise, Aesthetics, and Air Quality). Long-term impacts could result from the completion of new or expanded roadways or transit facilities in existing communities. The Plan was developed with local input through the rigorous Local Data Exchange (LDX) process (67 percent of local jurisdictions provided information) and therefore substantially reflects the development vision and trend of majority of local jurisdictions within the SCAG region. However, because the Plan's planning horizon year is beyond the timeline of many general plans, implementation of the Plan could result in changes to land use patterns as compared to what is currently shown in general plans and other planning documents. Therefore, there is potential for inconsistencies with general plans as well as regional conservation plans.
- **Mineral Resources:** Implementation of the Plan would require substantial amounts of aggregate resources for construction purposes, constituting a significant impact. The Plan has the potential to impact availability of mineral resources if transportation projects and land use development are constructed in mineral resource zones.
- **Noise:** Implementation of the Plan would likely result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, constituting a significant impact. Implementation of the Plan would generate varying levels of vibration and groundborne noise. The Plan may also result in exposure of persons to or generation of significant noise levels from aircrafts and other airport activity (including ground transportation), constituting a significant impact.
- **Population and Housing:** Implementation of the Plan may result in impacts to population and housing. Because the Plan's land use strategies that focus on PDAs, which are areas within the SCAG region where future growth can be located in order to support the region in meeting mobility and environmental goals, the Plan may result in intensifying growth in these areas of the region. Overall, however, the Plan accommodates

anticipated growth rather than inducing growth. The construction of transportation projects that require expansion of existing or designation of new ROWs may have the potential to result in the displacement of existing people and housing, necessitating the construction of replacement housing, thereby constituting a potentially significant impact.

- **Public Services:** Implementation of the Plan could affect the need for construction of new or physically altered fire protection and emergency response facilities to maintain acceptable service ratios. Although the location and size of such facilities is not yet known, impacts could occur, requiring the consideration of mitigation measures. The Plan could contribute to the need for construction of new or physically altered police facilities in response to and/or to accommodate intensified growth in some areas of the region to maintain acceptable service ratios. The Plan could contribute to substantial adverse physical impacts associated with the construction and subsequent operation of new or physically altered school facilities to maintain acceptable service ratios. The Plan could contribute to substantial adverse physical impacts associated with the construction of library facilities to maintain acceptable service ratios.
- **Recreation:** Implementation of the Plan would have the potential to increase use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration would occur, constituting a potentially significant impact. Implementation of the Plan would result in construction of additional linear and other recreation and park facilities, including a regional greenway network, a regional bikeway network, local bikeway networks, and local parks, the construction of which might have an adverse physical effect on the environment.
- **Transportation:** Implementation of the Plan may result in transportation impacts. As one of the primary goals of the Plan is to reduce VMT, the majority of the projects under the Plan are expected to be consistent with CEQA Guidelines Section 15064.3(b); however, despite the benefits shown by implementing the Plan, the Plan would result in an increase in total regional VMT and may not support achievement of the state's VMT reduction goals which could be inconsistent with CEQA Guidelines Section 15064.3(b).
- **Tribal Cultural Resources:** Implementation of the Plan has the potential to cause a substantial adverse change in the significance of tribal cultural resources defined in Public Resources Code Section 21074, as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe in the SCAG region.
- **Utilities and Service Systems:** Implementation of the Plan may have the potential to generate a substantial amount of solid waste during construction through grading and excavation activities, as well as debris resulting from removal of structures, due to the volume of solid waste debris expected to be generated with implementation of the Plan and lack of identified landfill capacity, impacts would be significant. Implementation of the Plan would potentially involve construction of new storm water drainage facilities and may require construction of new or expanded wastewater treatment facilities. Implementation of the Plan could result in a determination by one or more of the wastewater treatment providers in the region that there is inadequate capacity to serve the future population demand in addition to the provider's existing commitments, resulting in a significant impact. Implementation of the Plan could require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. The Plan could result in insufficient water supplies from existing entitlements and resources resulting in significant impacts.
- **Wildfire:** Implementation of the Plan may potentially exacerbate wildfire risks and thereby expose people to pollutant concentrations from wildfires or the uncontrolled spread of wildfires, particularly those populations living down wind of the fire. Despite encouraging development in PGAs and discouraging development in

GRRAs, development may continue to occur in urban/wildlands interface areas. Both development as well as necessary infrastructure such as power poles could result in additional wildfire risk.

- **Cumulative Impacts:** Connect SoCal 2024 is a regional-scale Plan comprised of policies and strategies, a regional growth forecast and land use pattern, and individual projects and investments. At this regional scale, a cumulative or related project to the Plan is another regional-scale plan (such as Air Quality Management Plans within the region) and similar regional plans for adjacent regions. Because the Plan, in of itself, would result in significant adverse environmental impacts with respect to all of the environmental topics (except for two specific issues) evaluated in Chapter 3 of this 2024 PEIR, these impacts would add to the environmental impacts of other cumulative or related projects. Mitigation measures that reduce the Plan's impacts would similarly reduce the Plan's contribution to cumulative impacts.

## 5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(d) states that an EIR must include a discussion of any significant irreversible environmental changes that would be caused by a proposed project. Specifically, Section 15126.2(d) states:

*Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.*

For purposes of this analysis, the Plan would result in significant irreversible environmental changes if it:

- Involves a large commitment of nonrenewable resources that would commit future generations;
- Results in irreversible damage from environmental accidents; or
- Results in irretrievable commitments of nonrenewable resources to justify current consumption.

### 5.2.1 LARGE COMMITMENT OF NONRENEWABLE RESOURCES THAT WOULD COMMIT FUTURE GENERATIONS

The Plan would result in the irreversible consumption of nonrenewable resources. The irreversible commitment of limited resources is inherent in any development project or, in the case of the Plan, combined transportation projects and potential development projects from the implementation of Plan policies and strategies. Resources anticipated to be irreversibly committed over the timespan of the construction activities related to the Plan include, but are not limited to, lumber and other related forest products; sand, gravel, and concrete; petrochemicals; construction materials; steel, copper, lead, and other metals; and water.

Growth pattern and land use changes that would result from Plan implementation would likely commit future generations to those uses. Once established, regional development land use patterns can be difficult to change and/or significantly influence without considerable political, social, and economic cost. The forecasted regional development land use pattern reflected in the Plan represents a commitment of these areas to those uses for the foreseeable future. The Plan emphasizes a compact land use pattern integrated with transportation and transit investments, and the result is more efficient use of urban land as well as land at the urban edges or in undeveloped



areas of the region. As a secondary result, per capita use of many nonrenewable resources decreases under this Plan.

However, construction activities related to transportation projects and land use development would nevertheless result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment and aggregate supply used in construction. It should be noted that while such construction activities would continue to contribute to the ongoing consumption of such resources, the amount of fossil fuels consumed on a per-project basis is anticipated to decline given the increasing share of zero-emission and low-emission vehicles and construction equipment that are expected to comprise the fleet mix through 2050.

With respect to operation activities, compliance with all applicable building codes, as well as project-level mitigation measures or project requirements, would help ensure that natural resources are conserved or recycled as feasible. It is also possible that new technologies or systems will emerge, or will become more cost-effective or user-friendly, that will further reduce the region's reliance upon nonrenewable natural resources; however, even with implementation of conservation measures, consumption of natural resources would generally increase with implementation of the Plan.

Furthermore, growth generally results in long-term increase in the demand for electricity and natural gas supplies and distribution. However, implementation of the Plan and other federal and state energy efficiency standards will result in lower per-capita demand by encouraging development in urban areas; encouraging energy conservation in new construction and existing buildings; and reducing the infrastructure energy demands by encouraging alternative transportation such as bicycling, walking, and public transit. Furthermore, the Plan will result in lower per-capita VMT through the horizon year.

The region also has multiple nonrenewable resources including agricultural lands, open space, habitat areas, and mineral resources areas that contain aggregate, oil, and natural gas. Increased levels of development outside of already developed areas could result in permanent loss or other adverse impacts to these resource areas. As discussed above, in general, the Plan seeks to encourage and facilitate growth in PDAs and minimize growth in GRRAs. Nonetheless, the Plan would result in the conversion of nonrenewable resources to urbanized uses.

## **5.2.2 IRREVERSIBLE DAMAGE FROM ENVIRONMENTAL EVENTS AND ACCIDENTS**

Any growth in the region includes the potential for irreversible damage from natural disasters or environmental accidents. For example, greater densities expose more people in the same area to unexpected environmental events such as fire, flood, and/or earthquake which could lead to irreversible damage. In addition, irreversible changes to the physical environment could occur from the accidental release of hazardous materials associated with transport on roadways as more hazardous materials are transported through the region and more people are in closer proximity to hazardous materials threats.

However, this exposure would exist under any growth scenario. Federal and state regulations require the Plan to accommodate expected growth in the region based on market-based forecasts. Connect SoCal 2024 minimizes the footprint of that growth particularly in GRRAs. Implementation of the Plan does not, in and of itself, result in greater potential of irreversible damage from an environmental accident.



### 5.2.3 IRRETRIEVABLE COMMITMENTS OF NONRENEWABLE RESOURCES TO JUSTIFY CURRENT CONSUMPTION

The region has multiple nonrenewable resources including agricultural lands, open space, habitat areas, and mineral resources areas that contain aggregates and natural gas. Increased levels of development outside of already developed areas could result in permanent loss or other adverse impacts to these resource areas. In addition, increased levels of development throughout the region could result in greater use of nonrenewable resources during construction, including nonrenewable aggregates, or increased use of glass, plastic, and other petroleum products. As discussed above, in general, the Plan seeks to encourage and facilitate growth in PDAs and discourage growth in GRRAs. Nonetheless, the Plan would result in the conversion of nonrenewable resources to urbanized uses.

New growth generally results in additional demand for energy (electricity, natural gas, propane, petroleum, diesel) supplies and distribution. However, the Plan, and other federal and state efforts, will result in lower per-capita demand by encouraging compact development; encouraging energy conservation in new construction and existing buildings; and reducing the infrastructure energy demands by encouraging alternative transportation such as bicycling, walking, and public transit. Furthermore, the Plan will result in lower per-capita VMT through the horizon year (2050). Section 3.8, *Greenhouse Gas Emissions*, of the 2024 PEIR further addresses VMT.

Any growth in the region will result in significant irreversible resource commitments. In evaluating the significance of a project's irreversible resource commitments, CEQA requires a lead agency to consider whether such commitments are "justified" (CEQA Guidelines Section 15126.2(c)). As discussed above, and consistent with the project objectives for the Plan (see Chapter 2, *Project Description*), the Plan is designed to minimize irreversible resource commitments, thus maximizing opportunities for future generations. While the Plan will result in irreversible resource commitments, by encouraging higher density, less-consumptive development, the commitments are justified and beneficial.

## 5.3 GROWTH-INDUCING IMPACTS

CEQA Guidelines Section 15126.2(e) requires that growth inducing impacts of a proposed project be considered. Growth inducing impacts are characteristics of a project that could directly or indirectly create economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth can be induced in a number of ways, including the elimination of obstacles to growth, or by encouraging and/or facilitating other activities that could induce growth. Examples of projects likely to have growth inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions or office complexes in areas that are currently only sparsely developed or are undeveloped. In addition, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental or of little significance to the environment. Induced growth is considered a significant impact only if it directly or indirectly affects the ability of agencies to provide needed public services or if it can be demonstrated that the potential growth significantly affects the environment, that is, that it would result in construction that would adversely affect the environment.

From the state perspective, the Plan must: identify areas within the region sufficient to house all the projected population for the 20-year plan, an eight-year projection of the regional housing need, and consider the state's housing goals; identify a transportation network to serve the regional transportation needs; and demonstrate how the region can coordinate land use and transportation planning to meet, if feasible, the GHG emissions reduction targets established pursuant to SB 375.

From the federal perspective, the Plan must comply with the federal Clean Air Act and federal laws relating to regional transportation plans (RTPs), which require, among other things, that the plan identify a transportation network that will serve projected land uses in the region. It must also realistically reflect that funding for all modes of transportation is constrained. As a result, the Plan focuses on maximizing the efficiency of existing infrastructure and looking for investments that yield maximum benefits.

As described in Chapter 2, *Project Description*, and Section 3.14, *Population and Housing*, the process for developing the Plan began with the development of a new growth forecast for the region. To develop the growth forecast, SCAG used a method grounded in an economic forecast that considers a wide range of variables affecting the U.S., state, and regional economies. Detailed demographic information is prepared with this economic forecast that includes household types (e.g., age, income, ethnicity, and size) and numbers of households. The growth forecast of projected regional population, employment numbers, and households is then used to calculate the new building square footage required for different segments of the economy (e.g., retail, office, industrial, etc.) and the new housing units required to house the projected population of the region.

In other words, population growth was forecast prior to preparation of the Plan and was used as a basis for the housing and employment growth projections. In this regard, the Connect SoCal 2024 planning process differs from the land use planning processes of local jurisdictions. Local government land use planning may be driven by a vision for a community that is not required to be constrained by specific economic or population forecasts, or by a mandated horizon date.

By law and by design, the Plan provides a coordinated strategy for managing land use patterns and transportation improvements to accommodate projected population growth. The Plan is intended to help shape growth patterns in the region, leading to better efficiency, higher sustainability, and more compact and mixed patterns of land use that are better served by transit and other mode choice options. But, for the reasons summarized above, it would be inaccurate to conclude that the Plan would induce that growth. First, SCAG wields no land use authority; all land use decisions remain with local jurisdictions. Second, as required by law, the Plan identifies areas within the region sufficient to house the population of the region; therefore, it is tailored to meet population growth, not to foster the construction of housing that has the potential to induce growth.

While population growth remains a factor generally outside of local control, cities and counties do control the provision of housing and employment opportunities for that population, and this ultimately determines densities, growth patterns, and resulting efficiencies in the use of land and resources. The Plan reflects a concerted attempt of local governments to influence population growth in a beneficial manner. The Plan represents the coordination of local land use policies with transportation investments that support mixed-use and compact development, transportation options, housing choice and diversity, conservation of agricultural land and natural resources, and use of existing assets. By accommodating efficient, sustainable, compact growth in existing developed areas and limited new areas, and not planning for anything more than nominal or by-right growth in rural areas, regional development pressures are accommodated in a more sustainable pattern, resulting in overall beneficial effects for the region.

As discussed in Section 3.14, *Population and Housing*, the Plan includes policies and strategies that guide new population growth within existing urbanized areas, PDAs, underutilized urban areas, and existing suburban town centers. The Plan would strategically target growth in PDAs and discourage growth in GRRAs. However, the improved accessibility from the Plan's transportation projects, transit investments, and land use strategies could also facilitate population and economic growth in areas of the region that are currently not developed, despite policies designed to limit such development.

The Plan would result in an overall increase in total VMT for all vehicle types which would be expected due to the increase in regional population (see Section 3.17, *Transportation*, of this 2024 PEIR for further discussion). However, the more efficient land use patterns and strategies included in the Plan would result in a decrease in per capita VMT compared to existing conditions and the No Project Alternative (See Chapter 4, *Alternatives*, of this 2024 PEIR for further discussion).

Because several variables influence growth, it is difficult to determine how the Plan alone would affect growth. As described in Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*, the Plan would affect each environmental issue area directly through implementation of transportation projects and potential development projects. The Plan would indirectly impact growth through the goals, policies and implementation strategies that would result in a more compact development pattern that simultaneously addresses a number of environmental issues than if no Plan were in place. Factors that would potentially induce population growth include roads, highways, freeways, rail, and other transportation improvements that provide access to previously undeveloped areas. High-occupancy vehicle projects would not be expected to induce growth as they are adding to an existing freeway instead of creating a new freeway. The availability of adequate water supplies, the availability of sewage treatment facilities, the availability of developable land, the types and availability of employment opportunities, housing supply and costs, commuting distances, cultural and recreational amenities, climate, and local government growth policies contained in general plans and zoning ordinances would also induce population growth. These are contributing factors to consider when evaluating whether the Plan would, in and of itself, induce population growth, but are not necessarily an indication that the Plan is growth inducing.

Development consistent with the Plan would result in additional commerce, industry, recreation, public services, and infrastructure throughout the region. However, as discussed above, total population is expected to remain the same with or without the Plan. Generally, the Plan accommodates growth in a manner substantially consistent with local general plans, regional values and visions, and state and federal laws. The Plan would provide greater access to more of the region than under existing conditions and under the No Project Alternative due to integrated transportation projects and land use strategies identified in the Plan; however, encouraging growth in the PDAs and minimizing growth in GRRAs could influence the geographic spread of growth. Therefore, in general, the Plan has the potential to influence and possibly induce growth in specific parts of the region (including areas that are partially urbanized already) by providing new or expanded access and by encouraging growth where infrastructure may not already be present or if present is insufficient. However, overall, the Plan is a response to forecast growth and would accommodate and facilitate growth in the region rather than induce growth.

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