

CONNECT SOCIAL 2024

The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy
of the Southern California Association of Governments

PUBLIC PARTICIPATION & CONSULTATION

Comments & Responses

APPENDIX 3 OF 5

ADOPTED APRIL 4, 2024



Public Participation & Consultation

Comments & Responses

APPENDIX 3 OF 5

INDEX REPORT	i
COMMENTS AND RESPONSES	1

CONNECT SOCIAL 2024 INDEX REPORT

AFFILIATION	SUBMITTAL ID	PAGE NO
Active Sierra Madre	0001664	1
Antelope Valley Transit Authority	0001665	1
California Air Resources Board	0001735, 0001776	1
Caltrans	0001691, 0001726, 0001732, 0001758, 0001759, 0001762, 0001764, 0001765	7
Center for Community Action and Environmental Justice	0001709, 0001743	46
Center for Demographic Research	0001706	49
Citizens Coalition for Safe Community, and Sierra Club transportation	0001698, 0001700	51
City of Anaheim	0001772	52
City of Eastvale	0001714	53
City of Huntington Beach	0001761	55
City of Irvine	0001721	62
City of La Habra	0001674	67
City of Menifee	0001670	68
City of Murrieta	0001747	68
City of Oxnard	0001669, 0001710, 0001712, 0001828	70
City of Pico Rivera	0001666	74
City of Riverside	0001737	74
City of Whittier	0001820	75
Climate Action Santa Monica	0001729	76
County of Orange	0001720	76
County of Ventura Planning Division	0001683	77
Dan Wentzel	0001713	77
Eve Air Mobility	0001745	77
Federal Aviation Administration	0001673	78
Five Point Operating Company, LP	0001675	79
Friends of Harbors, Beaches and Parks	0001685, 0001686, 0001687, 0001688, 0001689, 0001753, 0001755	81
HDR	0001671	137
Highland Fairview	0001821	138
Hills for Everyone	0001763	139
House Farm Workers	0001717	151
Inland Empire Biking Alliance	0001690	154
Los Angeles County Department of Regional Planning	0001684	154
Los Angeles World Airports	0001817	157
Method Schools Corp	0001678	158
Naval Base Ventura County	0001818	158

AFFILIATION	SUBMITTAL ID	PAGE NO
Neighborhood Housing Services of the Inland Empire (NHSIE)	0001746	160
Ontario International Airport Authority	0001682, 0001694	161
Orange County Council of Governments	0001766, 0001777, 0001778, 0001779, 0001780, 0001781, 0001782, 0001783, 0001784, 0001785, 0001786, 0001787, 0001788, 0001789, 0001790, 0001791, 0001792, 0001793	161
Orange County Transportation Authority	0001668, 0001733, 0001760, 0001767, 0001768, 0001770, 0001771	298
Port of Long Beach	0001718	311
Port of Los Angeles	0001815, 0001816	312
Rail Passenger Association of California	0001697, 0001724	318
Riverside County Transportation Commission	0001662	319
Riverside Neighbors Opposing Warehouses	0001667, 0001676, 0001696, 0001822, 0001823, 0001825, 0001829	320
San Bernardino County Transportation Authority	0001773	351
San Gabriel Valley Council of Governments	0001715	358
Sierra Club	0001740	358
South Bay Cities Council of Governments	0001774	359
Southern California Leadership Council	0001744, 0001756	361
Southern California Regional Rail Authority	0001769	367
The Robert Redford Conservancy for Southern California Sustainability	0001757	369
Transportation Corridor Agencies	0001751	377
Ventura County Transportation Commission	0001736	378
World Be Well Organization	0001775	381
A, Aida	0001730	383
Albert, James	0001677, 0001707	383
Billay, Perias	0001701	384
Binnie, Michael	0001705	384
Bowman, Daniel	0001716	385
Burns, Philip	0001703	385
Chen, Caroline	0001663	385
Clarke, Darrell	0001699	385
Dedicatoria, Kevin	0001708	386
Ertl, Dawn	0001693	387
Hague, George	0001752	387
Hartley, Ken	0001692	388
Hoops, Erin	0001695	388
Jolles, Mark	0001719, 0001722, 0001741, 0001748, 0001749	389

AFFILIATION	SUBMITTAL ID	PAGE NO
M, C	0001681	392
Miller, Jay	0001711	392
Moreau, Austin	0001723	393
Nielsen, Donald	0001702	393
Norlen, Carl	0001725	394
Norman, Marven	0001750	394
Roberts, Tyler	0001738	396
Samdarshi, Mihir	0001704	397
Sandbrook, Richard	0001672	397
TC	0001661	398
Wilson, Patrick	0001679	398
Anonymous	0001680	398

CONNECT SOCAL 2024 COMMENTS AND RESPONSES

ID	COMMENT	RESPONSE
Submitted by	Active Sierra Madre	Submittal 0001664
0001664.01.1	I am a resident of Los Angeles County and I support the plan's efforts to make transit a backbone of our transportation system. I also strongly support efforts to increase housing near transit and investment in safer street designs so that active transportation can be a convenient choice for more Southern Californians. The coordination of active transportation, housing, and transit investments is very important.	Comment noted.
0001664.01.2	I would add that the advent of e-bikes increases the range and practicality of biking for a wider range of residents in communities across Southern California and there must be increased incentives for cities to prioritize safe bike infrastructure, even where transit density is lower.	Comment noted. The Mobility Technical Report, particularly the Active Transportation section, notes that e-bikes have made bicycling more accessible to a wider range of individuals, including those who may have physical limitations or need assistance with longer rides. In addition, the Mobility Technical Report includes strategies under Complete Streets and Multimodal Integration to expand the region's networks of bicycle and pedestrian facilities, for both first/last mile connections and more broadly for people walking and biking. SCAG recognizes that these facilities could potentially support e-bike users.
0001664.01.3	Finally, I would emphasize the need to shift a significant portion of existing transportation funding sources away from highway expansion and toward (1) increased transit operations and frequency and, (2) improved active transportation connectivity around transit and other local destinations such as schools, retail, job centers, and recreation.	Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. It is important to note that the draft Connect SoCal 2024 includes \$38 billion for active transportation investments and \$385 billion for transit and passenger rail investments. Together, this accounts for over half of total plan expenditures. For final Plan Investment information, please see the Transportation Finance Technical Report.
Submitted by	Antelope Valley Transit Authority	Submittal 0001665
0001665.01	On behalf of AVTA, Metro would like to include project LA9919186 in the 2024 RTP. This project was added to the FTIP Consistency Amendment #23-26. Project Title: Four (4) Commuter Coaches for new High Desert Connector route. Project Description: New route between Antelope and Victor Valleys along State Hwy 138. Will deploy three (3) routes in the morning and three (3) routes in the evening. Route will utilize three (3) commuter coaches and one (1) for spare.	The inclusion of the limited service bus route is deemed to have a minimal effect on outcomes for Connect SoCal 2024 or the associated PEIR determination. The project's potential impact on transportation modeling, increases to criteria pollutants or GHG emissions, and impact on fiscal constraint were assessed and any effects are assumed to be negligible. The High Desert Connector route has been included in the Final Connect SoCal 2024.
Submitted by	California Air Resources Board	Submittal 0001735
0001735.01.1	Please find CARB staff's comments attached. California Air Resources Board (CARB) staff appreciate the opportunity to review and engage with the Southern California Association of Governments (SCAG) staff on its draft 2024 Regional Transportation Plan / Sustainable Communities Strategy (Draft 2024 RTP/SCS). This work is more important than ever. CARB's second Senate Bill 150 progress report shows that as of 2019, California as a whole and the SCAG region are not on track to meet the greenhouse gas (GHG) emission reductions expected under Senate Bill (SB) 375 and that vehicle miles traveled is increasing. Governor Newsom signed Executive Order N-19-19 to redouble the State's efforts to reduce GHG emissions, explicitly focusing on lowering vehicle miles traveled. To achieve the State's climate mandates, California needs significant and immediate changes to how we plan, fund, and build our communities and transportation systems.	Comment noted.

ID	COMMENT	RESPONSE
0001735.01.2	<p>The SCS plays a critical role in supporting the State's climate efforts, as well as in accomplishing its objectives to create a stronger economy, healthier environment, and improved quality of life. We appreciate SCAG's work on regional strategies for reducing vehicle miles traveled and associated GHG emissions in its geographically, economically, and socially diverse region. The Draft 2024 RTP/SCS outlines these goals and benefits as well as the proposed strategies for getting there. It is helpful to CARB staff and supports public transparency that Chapter 2 includes a discussion of progress made since the last plan and that Chapter 3 includes a table outlining which strategies support quantified GHG emission reductions under SB 375 and clearly identifies SCAG's role and other responsible parties. CARB staff also appreciate the inclusion and discussion of equity and the historical inequities and harm to overburdened communities in the region, as well as the discussion of future challenges and uncertainties. The use of visuals, data, and maps to communicate information in the plan is also effective.</p>	Comment noted.
0001735.01.3	<p>In reviewing the Draft 2024 RTP/SCS, CARB staff looked to identify preliminary concerns and where additional information would be needed to conduct its final SCS GHG evaluation under SB 375, with a focus on whether the plan includes supporting actions and/or investments to implement the strategies. CARB's final SCS evaluation will focus on assessing whether GHG emission reductions are reasonably supported by the plan, as outlined in the Final Sustainable Communities Strategy Program and Evaluation Guidelines (SCS Evaluation Guidelines).</p>	Comment noted.
0001735.01.4	<p>Although this letter is focused on policy analyses, it is important to note that CARB's evaluation of the final RTP/SCS is predicated on the technical accuracy of GHG emissions quantification. Early in the SCS development process, SB 375 requires MPOs such as SCAG to submit a technical methodology to CARB. [Footnote 1] The MPO and CARB staff are then intended to work together until CARB staff conclude that the calculations and quantifications provided would yield accurate estimates of GHG emission reductions. As detailed in a separate letter provided to SCAG staff on January 12, 2024, CARB staff continue to have significant outstanding concerns about the technical methodology.</p>	Comment noted. SCAG staff will work with CARB staff to resolve outstanding concerns about the technical methodology.
0001735.01.5	<p>It is critical that CARB staff and SCAG staff continue working together to reach agreement on SCAG's technical methodology as soon as possible to avoid the risk of quantification issues arising in SCAG's final RTP/SCS. Issues with quantifications that leave CARB staff unable to accept SCAG's determination as to whether its SCS meets GHG emission reduction targets could lead to the need for SCS revisions and further board approvals, the requirement to develop an Alternative Planning Strategy under California Government Code §65080 (b) (2) (H), and/or ineligibility for certain State transportation funds.</p>	Comment noted. SCAG staff are working to update the Technical Methodology to Estimate Greenhouse Gas Emissions for Connect SoCal 2024 in consideration of the separate letter provided to SCAG on January 12, 2024.
Submitted by	California Air Resources Board	Submittal 0001776

ID	COMMENT	RESPONSE
0001776.01	<p>Policy analyses of GHG emission reduction strategies</p> <p>As outlined in the SCS Evaluation Guidelines, CARB's policy analyses evaluates whether the RTP/SCS strategies and commitments support the stated GHG emission reductions, and whether there are any risks to not achieving those strategies. As part of this, CARB staff assess whether there are supportive key actions (e.g., investments and whether the region is making plan adjustments and evaluating potential risks to achieving the land use and transportation goals, as necessary, to meet the targets) for the RTP/SCS strategies. In the final 2024 RTP/SCS submittal, if CARB cannot evaluate that the region is on track to achieve the GHG emission reduction target with either demonstrated progress on implementing the strategies and/or clear commitments to actions to get on track, then CARB may not be able to accept SCAG's final GHG emission reduction quantification and determination.</p> <p>Below are CARB staff's concerns about the GHG emission reduction strategies as discussed in the Draft 2024 RTP/SCS and the additional information needed to evaluate the SCS GHG emissions quantification upon final submittal to CARB. Please address these comments and make the following information available to CARB in the final 2024 RTP/SCS or technical appendices to support our final evaluation.</p>	<p>Comment noted. SCAG recognizes that CARB staff must assess whether the Plan is able to achieve the land use and transportation goals in order to meet the greenhouse gas (GHG) emissions reduction targets. To this end, SCAG is committed to working with CARB staff in providing as much information as possible to support their final evaluation of Connect SoCal 2024. The SCS Evaluation Guidelines indicates that CARB staff recognizes that the information and data requested "may be more readily available for some MPOs than for others due to due to availability of MPO resources (e.g., staffing, funding, and schedule), datasets, and other related information about strategies. CARB is committed to working with MPOs to identify alternative attributes, data, or methods if there are potential issues with the ability of MPOs to provide information requested by CARB staff and/or if CARB staff have identified potential risk(s) indicating an MPO may not achieve the strategies and commitments identified in the SCS."</p> <p>SCAG's jurisdiction comprises a six-county region that includes the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura, as well as 191 cities. The total area of the SCAG region is approximately 38,000 square miles. The region includes the county with the largest land area in the nation, San Bernardino County, as well as the county with the highest population in the nation, Los Angeles County. The SCAG region is home to approximately 19 million people powering the 16th largest economy in the world. The region is home to the two largest container ports in the Western Hemisphere (Los Angeles and Long Beach), and the world's fourth busiest airport system (Los Angeles World Airports). It can be prohibitive from an expense and staff time perspective to collect sufficient data to represent the SCAG region beyond the inputs and outputs developed for SCAG's regional travel demand model.</p> <p>SCAG would note that the SCS Evaluation Guidelines provide guidance for CARB staff in its assessment of the SCS, but they do not set forth regulatory requirements that SCAG must meet in order to demonstrate the sufficiency of the SCS. The Guidelines themselves state that staff's approval of the Guidelines "does not signify that the contents necessarily reflect the views and policies of the California Air Resources Board."</p> <p>Additionally, the changes in state regulations since these Guidelines were approved in 2019, namely the Advanced Clean Cars II regulation, suggests that these Guidelines either require updating or modification in their application.</p>
0001776.02	<p>- Congestion pricing: The Draft 2024 RTP/SCS includes a strategy to support implementation of congestion pricing programs as part of the Local Road Charge Program, but it is not clear how this will be achieved and to what extent it will happen by 2035. In CARB's final SCS evaluation, CARB staff will be looking for commitments to specific actions outlined with timelines, key milestones, and investments necessary to support the implementation of this strategy by 2035 to be identified in the RTP/SCS or technical appendices. This is especially important because CARB staff are concerned that not enough progress has been made towards implementing this strategy since the last plan to fully support the GHG emission reductions being quantified because of the strategy.</p>	<p>Comment noted. Chapter 4 (Financial Summary) and the Transportation Finance Technical Report include details about all revenues sources in Connect SoCal 2024 with assumptions addressing when each source would be available and implementation steps for new reasonably available revenue. Table 4 in the Transportation Finance Technical Report addresses risk associated with key revenue sources included in the Plan. Components of the Local Road Charge Program would be available earlier than 2035 - for example, when segments of planned express lanes are opened for public use. Further information is detailed in the final "Technical Methodology to Estimate Greenhouse Gas Emission Reductions for Connect SoCal 2024" which will be submitted to CARB as part of the formal SCS submittal.</p> <p>The 2022 Scoping Plan suggests that in order to achieve the GHG emissions reduction targets, the State should lead efforts to implement the transition from fuel taxes to mileage-based fees (by 2030) and roadway pricing (by 2025). This is earlier than is assumed in Connect SoCal 2024. SCAG's implementation schedule is predicated on the State laying the groundwork.</p>

ID	COMMENT	RESPONSE
0001776.03	<p>- Mileage-based user fee: The Draft 2024 RTP/SCS includes a strategy to support the transition to a mileage-based user fee to replace state and federal gas taxes. However, it is CARB staff's understanding from the revised draft technical methodology that this is also a GHG emission reduction strategy, indicating that this pricing strategy would be implemented in a way that helps to reduce vehicle miles traveled and not only replace the gas tax. This should be clarified in the final 2024 RTP/SCS. In CARB's final SCS evaluation, CARB staff will be looking for commitments to specific actions outlined with timelines, key milestones, and investments necessary to support the implementation of this strategy by 2035 to be identified in the RTP/SCS or technical appendices. This is especially important because CARB staff are concerned that not enough progress has been made towards implementing this strategy since the last plan to fully support the GHG emission reductions being quantified because of the strategy.</p>	<p>Comment noted. Consistent with the CARB SCS evaluation approach, SCAG understands that it is not eligible to consider GHG emission reductions from the transition of state fuel taxes to a mileage-based user fee and therefore has not included it for GHG emission reduction quantification in the technical methodology.</p> <p>Chapter 4 (Financial Summary) and the Transportation Finance Technical Report include details about all revenues sources in Connect SoCal 2024 with assumptions addressing when each source would be available and implementation steps for new reasonably available revenue. Table 4 in the Transportation Finance Technical Report addresses risk associated with key revenue sources included in the Plan. Further information is detailed in the final "Technical Methodology to Estimate Greenhouse Gas Emission Reductions for Connect SoCal 2024" which will be submitted to CARB as part of the formal SCS submittal.</p> <p>The 2022 Scoping Plan suggests that in order to achieve the GHG emissions reduction targets, the State should lead efforts to implement the transition from fuel taxes to mileage-based fees (by 2030) and roadway pricing (by 2025). This is earlier than is assumed in Connect SoCal 2024. SCAG's implementation schedule is predicated on the State laying the groundwork.</p>
0001776.04	<p>- Job center parking strategy, parking deregulation, and co-working strategies: The revised draft technical methodology outlines a GHG reduction strategy to increase the parking price in job centers throughout the region, a strategy to support eliminating parking minimums in areas within a half-mile of high-quality transit, and a strategy to support the strategic development of co-working spaces in the region for long-distance commuters in certain industries. However, CARB staff could not locate any supporting strategies, actions, or specific investments to support these three strategies in the Draft 2024 RTP/SCS. As noted earlier, CARB staff's final determination relies on an analysis of policy commitments in the RTP/SCS. CARB staff will need to see evidence that these strategies are supported with key actions in the 2024 RTP/SCS. Additionally, CARB staff will be looking for recent investments or significant actions, beyond planning studies, that demonstrate that these individual strategies are moving forward since the last plan. CARB staff are concerned that not enough progress has been made towards implementing these strategies since the last plan to fully support the GHG emission reductions being quantified for these three strategies.</p>	<p>Connect SoCal 2024 includes many policies, strategies and investments that support GHG emission reductions. For the job center parking strategy, there is an Implementation Strategy that states, "Continue development and support for job-center parking pricing, including through Smart Cities and the Mobility Innovations Sustainable Communities Program (SCP) grant program." This can be found in Section 3.4 Plan Fulfillment under the Funding the System/User Pricing category,</p> <p>For the parking deregulation GHG emission reduction strategy, this tactic can be a component of fulfilling either the Regional Planning Policies or Implementation Strategies under the Priority Development Areas, 15-Minute Communities or Sustainable Development categories. See Chapter 3 of the plan for more details on these categories. Details on local implementation efforts related to the Parking Deregulation GHG reduction strategy have been added to Section 6.4.4 of the Land Use and Communities Technical Report.</p> <p>Upon further consideration, SCAG is no longer considering the co-working strategy as a GHG emission reduction strategy and will remove it from the Technical Methodology in the final SCS submission to CARB. However, no changes have been made to the Plan documents or technical reports. The removal of this strategy is specific to its quantification towards SCAG's GHG emission reduction target.</p>

ID	COMMENT	RESPONSE
0001776.05	<p>- Infill development, increased density near transit, and shorter trips through land use strategies: These complementary strategies are outlined in the revised draft technical methodology and have a clear nexus to the goals, strategies, and outcomes highlighted in the Draft 2024 RTP/SCS. The draft plan and the technical appendices include information about how the forecasted development pattern was developed and where growth is expected to occur. CARB staff need a better understanding of growth assumed in the different priority development area (PDA) types because one of the PDA types is "Spheres of Influence", which does not support the infill development strategy the same way that growth in the other PDA types do. A summary of housing, employment, and population growth by PDA type and by PDA type by jurisdiction will assist with CARB staff's final evaluation. For the final evaluation of the SCS, CARB staff will also need to see additional information summarizing growth by place type that is not currently available in the Draft 2024 RTP/SCS or the technical appendices. Per CARB's SCS Evaluation Guidelines, please provide a summary of housing, employment, and population growth by place type or other sub-regional geography.</p>	<p>PDA's are an umbrella term and spheres of influence (SOIs) differ from the other three types of PDA's that are more clearly linked to infill development strategies. However, as an agency without direct land use authority, SCAG realizes that there is going to be some degree of growth in the six unincorporated county areas. Development in these jurisdictions' SOI areas rather than their non-SOI areas promotes natural land conservation, efficient use of existing and planned infrastructure and prevents travel-inducing leapfrog development along the urban fringe. Additionally, because of the nature of jurisdictional boundaries in Southern California, much of the land in unincorporated areas is well within the region's urbanized area boundaries and SOIs include numerous areas of urban infill, in addition to greenfield, development opportunities.</p> <p>In order to facilitate assessment of the non-Sphere of Influence PDA's, an additional breakdown of growth by PDA type has been added to the Land Use and Communities Technical report, as these 191 (out of 197) by definition cannot have Spheres of Influence in their boundaries. Additional breakdowns are provided in final updates to the technical methodology as needed.</p>
0001776.06	<p>- 2035 data and assumptions: The Draft 2024 RTP/SCS describes the existing conditions and the vision for the future in 2050 using data, maps, and performance measures. When the final 2024 RTP/SCS is submitted to CARB for evaluation, CARB staff will need much of this information for the 2035 SCS target year, in addition to the base year and plan horizon year of 2050, to complete our policy analyses. For transparency, please consider publishing this information for 2035 in the final 2024 RTP/SCS, a subsequent appendix, or a technical memo.</p>	<p>Comment noted. SCAG values transparency throughout our regional planning process, including our modeling efforts in support of RTP/SCS development. To facilitate CARB's evaluation of Connect SoCal 2024 relative to achievement of our 2035 GHG reduction target, SCAG will provide a supplementary technical memo to CARB detailing our 2035 modeling output at the time of our submittal of the Plan.</p>

ID	COMMENT	RESPONSE
0001776.07	<p>- Regional Housing Needs Assessment (RHNA): Senate Bill 375 requires that the SCS, among other things, "identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584." This is referring to the RHNA. Although no RHNA is being developed with the 2024 RTP/SCS, the plan must accommodate the most recent (sixth cycle) RHNA, that was adopted by SCAG's Regional Council in 2021. In round numbers, SCAG's sixth cycle RHNA is to plan for 1.34 million housing units by 2029. The Draft 2024 RTP/SCS forecasts 1.6 million new housing units to be built by 2050.</p> <p>The Draft 2024 RTP/SCS only provides the total housing unit estimate for the region by 2050. It does not include housing unit projections by any other geography, such as county, or for any other year than 2050. CARB staff need to understand the differences between the amount of housing assumed to be built by 2050 in the 2024 RTP/SCS and the units being planned by 2029 to satisfy the current RHNA at a finer level than regionally. Please provide the housing units projected in the final 2024 RTP/SCS for 2035 and 2050 compared to the RHNA at a jurisdiction level for the entire region. If the final 2024 RTP/SCS includes housing unit projections for 2029 or 2030, that information would also be useful since SCAG's sixth cycle RHNA plans through October 2029</p>	<p>Due to the necessity of conducting travel demand modeling, Connect SoCal projects households, not housing units. While characteristically households are defined as occupied housing units, vacancy rates and definitions of vacancy vary over time and space and the relationship between households and housing units can be expected to differ slightly (see Section 3.2, Demographics & Growth Forecast Technical Report).</p> <p>Household projections are provided by county at 5-year intervals, including 2030 in Table 12 of the Demographics & Growth Forecast Technical Report and jurisdiction-level projections for 2035 and 2050 are available in Table 13. The availability of growth forecast data is detailed by spatial scale, variable, and time period in Table 2 of the Land Use & Communities Technical report. Due to the inherent uncertainty in forecast outcomes (see Figure 2 of the Demographics & Growth Forecast Technical Report), data beyond what is outlined in this table may be developed for various modeling and compliance purposes but is not considered a primary, externally-reviewed, or in any way adopted component of Plan development.</p> <p>The relationship between the growth projection and RHNA are described in further detail in section 4.6 of the Demographics & Growth Forecast Technical Report, and specifically include a description consistent with SCS statute cited above that "it is not expected or required that every jurisdiction's household forecast match or exceed their 6th cycle RHNA allocation, as this involves many factors. However, the expectation during the LDX and the Connect SoCal 2024 plan development process is that SCAG and local jurisdictions account for the increase in available sites resulting from RHNA into account when developing the growth forecast."</p> <p>Given that housing production in the region has not exceeded 55,000 units/year since 2006 nor exceeded 100,000 units/year since the 1980s (see, e.g., Figure 6), projection at an unrealistic annual rate of 160,000 households or units over each of the next several years, as is reflected in the RHNA planning requirement by 2029, would be inconsistent with SCAG's requirement to use the most recent data and assumptions to conduct the growth forecast, per 42 USC Section 7506(c)(1)(B)(iii) as described in Section 1.2 of the Demographics & Growth Forecast Technical Report. 6th RHNA allocations at the jurisdiction-level are available separately on the SCAG website.</p>
0001776.08	<p>- Revenues: The Draft 2024 RTP/SCS has a revenue forecast of \$750.1 billion for years 2025 to 2050. Most of the plan relies on core revenues, which are existing transportation funding sources projected to 2050. Approximately 22% of the total revenue forecasted, or \$162.2 billion, is assumed to be from "new reasonably available revenue sources." A large percentage of the revenues projected from "new reasonably available" sources is from pricing – primarily mileage-based user fee pricing, congestion pricing, increases in parking pricing at major job centers, and additional toll revenue from planned express lanes. However, the timing for these pricing revenues, and for all the new revenue sources forecasted, is unclear. CARB staff are concerned about this because several of the GHG emission reduction strategies rely on these new revenues for implementation prior to 2035, per the revised draft technical methodology. Also, these pricing strategies are themselves included as GHG emission reduction strategies. It is not clear how these pricing strategies will be implemented early enough to not only see the GHG emission reductions from pricing, but also see enough revenue from pricing or other new revenues to implement the other GHG emission reduction strategies by 2035. Given the concerns noted above on the pricing strategies, if SCAG revises the timing or implementation of these strategies in the final plan, please also revise the final plan to demonstrate that the pricing revenues will be available by the dates they are needed for each strategy relying on these funds, as appropriate. Please also show alternative revenue sources for the implementation of the impacted strategies, as needed.</p>	<p>Comment noted. Chapter 4 (Financial Summary) and the Transportation Finance Technical Report include details about all revenues sources in Connect SoCal 2024 with assumptions addressing when each source would be available and implementation steps for new reasonably available revenue. Table 4 in the Transportation Finance Technical Report addresses risk associated with key revenue sources included in the Plan. Components of the Local Road Charge Program would be available earlier than 2035 - for example, when segments of planned express lanes are opened for public use. Further information is detailed in the final "Technical Methodology to Estimate Greenhouse Gas Emission Reductions for Connect SoCal 2024" which will be submitted to CARB as part of the formal SCS submittal.</p> <p>The 2022 Scoping Plan suggests that in order to achieve the GHG emissions reduction targets, the State should lead efforts to implement the transition from fuel taxes to mileage-based fees (by 2030) and roadway pricing (by 2025). This is earlier than is assumed in Connect SoCal 2024. SCAG's implementation schedule is predicated on the State laying the groundwork.</p>

ID	COMMENT	RESPONSE
0001776.09	<p>Conclusion</p> <p>The comments in this letter represent initial concerns and questions that are critical to address prior to CARB staff's final SCS review and determination. CARB staff look forward to continuing our collaboration with SCAG staff and are committed to working together to address these requests so that we are achieving the climate goals we are all working towards. CARB's final evaluation and ultimate decision to accept or reject SCAG's determination that the 2024 RTP/SCS achieves the GHG emission reduction target for 2035 will reflect a full review of the 2024 RTP/SCS and is not limited by these comments, concerns, or requests. Upon receiving the final SCS submittal, CARB staff will conduct a thorough review following the SCS Evaluation Guidelines.</p>	Comment noted.
0001776.10	<p>Finally, please note that SCAG's 2035 GHG emission reduction target is 19%. The current SCS Evaluation Guidelines allow MPOs to round up if necessary to reach their targets. CARB staff will be re-evaluating this policy in coming years as part of discussions with the MPOs and the public. CARB staff advise SCAG to ensure the 2024 RTP/SCS plans to achieve the full target and not assume that rounding will be allowed in the future. If you have any questions, please contact me at (279) 208-7841 or lezlie.kimura@arb.ca.gov .</p>	Comment noted.
Submitted by	Caltrans	Submittal 0001691
0001691.01	<p>I would like to request that project FTIP ID SBD239801, Reimagining and Reconnecting Route 66 Project, to be included in the final 2024 RTP as a standalone RTP financially constrained project rather than under lump sum RTP ID REG0703.</p>	<p>The proposed project change to Reimagining and Reconnecting Route 66 (FTIP #SBD239801) is deemed to have a minimal effect on outcomes from Connect SoCal 2024 or the PEIR determination. The proposed project change will have no impact on transportation modeling, increases in criteria pollutants or GHG emissions, and only a very minor effect on fiscal constraint. The proposed project change has been included as a standalone project in the financially constrained Final Connect SoCal 2024.</p>
Submitted by	Caltrans	Submittal 0001726
0001726.01	<p>I'm very excited about the mileage-based user fee for roads and freeways, and not just for express lanes. I'm hoping residents of SoCal can be convinced that it's in everyone's best interest and that the policy can get through the legislature! It's only fair that people who use freeways pay a usage fee just like transit users.</p>	Comment noted.
0001726.02	<p>I really hope the concept of 15-minute communities can be developed in existing communities and incorporated into new developments across the region. Re-shaping the status quo is obviously a huge task, but reducing the need for driving with that kind of community will obviously reduce traffic congestion in the future, and improve quality of life. Very cool idea!</p>	Comment noted.
Submitted by	Caltrans	Submittal 0001732
0001732.01	<p>Please change the completion year for RTP ID 3A04A26 on Table 2 Financially-Constrained RTP/SCS Projects to 2050 from 2030.</p>	<p>The requested project change to RTP ID#3A04A26 is determined to have a minimal effect on outcomes from Connect SoCal 2024 or the PEIR determination. Revising the project completion year of this project will have insignificant impacts on regional transportation modeling, increases in criteria pollutants, GHG emissions, and fiscal constraint. The project update is included in the Final Project List Technical Report.</p>
Submitted by	Caltrans	Submittal 0001758

ID	COMMENT	RESPONSE
0001758.01	<p>Based on meetings and email exchanges with appropriate Southern California Association of Governments (SCAG) staff during November and December of 2023, it is Caltrans' understanding that RTP ID R24P001 on page 430 of the Project List Technical Report represents "Beyond SCORE" projects as described in SCAG's Integrated Passenger and Freight Rail Forecast Study, a SCAG document that is discussed in the Goods Movement Technical Report. Caltrans is requesting formal confirmation that the following two projects (Commerce Flyover Project and Hobart/Commerce Intermodal Facility Leads Project) are indeed included as part of RTP ID R24P001 and that they are considered to be included in the financially constrained portion of projects listed in SCAG's 2024 RTP/SCS. Summaries of the two projects are provided below.</p> <p>[project 1 of 2]</p> <p>Commerce Flyover Project - This project proposes to construct a two-track flyover (grade-separated rail bridge) on a rail corridor segment just east of downtown Los Angeles on the BNSF San Bernardino Subdivision (Commerce Corridor). The project will construct improvements to separate two tracks to serve passenger rail service from the other main tracks, lead tracks, and staging tracks that serve the freight rail within this segment of the corridor. The project will improve operations, efficiency, and safety of passenger rail service and have additional co-benefits for planned California High Speed Rail Service. It will also improve operations, efficiency, and safety at the Hobart Yard IMF and Commerce Yard IMF, and the Commerce Corridor by removing conflicting passenger rail service from the tracks used by freight rail operations. This will result in improved goods movements between the Ports, regional freight goods producers, and the state and national rail networks. This will also result in reduced congestion, reduced delays, and improved operations for passenger and freight rail trains moving through the corridor. The total cost for this project is \$939 million and is scheduled for completion in December 2028.</p>	<p>This response serves as confirmation that the Commerce Flyover Project and the Hobart/Commerce Intermodal Facility Leads Project are included as part of RTP ID #R24P001 (which captures additional freight and passenger rail enhancements that goes beyond the SCORE program) and are considered to be included in the financially constrained portion of Connect SoCal 2024. Once the Connect SoCal 2024 is approved, please contact LA Metro Programming staff to program the project into the current FTIP.</p>
0001758.02	<p>[project 2 of 2]</p> <p>Hobart/Commerce Intermodal Facility (IMF) Leads Project - This project provides increased efficiency of the freight corridor through traffic on the main tracks, improves capacity and efficiency of the yards, improves movement and staging of train movements between the yards, improves throughput of freight and passenger trains, and provides for future improvements to fully separate freight and passenger rail movements through the yards. This project involves improvements to the shared use (both passenger and freight rail operations) rail corridor and to the lead tracks (connecting the mainline to the rail yard) and staging tracks in the adjacent Hobart IMF, Commerce IMF, as well as staging tracks at C-Yard. The total cost for this project is \$1.202 billion and is scheduled for completion in December 2028.</p> <p>Caltrans HQ Division of Transportation Planning, Office of Rail Planning & Implementation and the District 7 Division of Planning would like to express its appreciation for SCAG's help and cooperation in this regard. We look forward to working with SCAG to get the above two projects programmed into the Federal Transportation Improvement Program as soon as possible.</p>	<p>This response serves as confirmation that the Commerce Flyover Project and the Hobart/Commerce Intermodal Facility Leads Project are included as part of RTP ID #R24P001 (which captures additional freight and passenger rail enhancements that goes beyond the SCORE program) and are considered to be included in the financially constrained portion of Connect SoCal 2024. Once the Connect SoCal 2024 is approved, please contact LA Metro Programming staff to program the project into the current FTIP.</p>
Submitted by	Caltrans	Submittal 0001759
0001759.01	<p>Caltrans Headquarters HQ Office of Regional Planning and HQ Air Quality Branch The Division of Transportation Planning, Air Quality Branch also completed a quality assurance review of the SCAG Connect SoCal Transportation Conformity Analysis and the Conformity Analysis Documentation checklist. The comments are identified in the Transportation Conformity Analysis section and correspond to the Conformity Analysis Documentation checklist.</p> <p>Overall, the page references on the RTP Checklist included whole chapters and entire technical reports, which hindered ease of reviewing the documents to provide Stakeholder feedback. We recommend that SCAG reference specific page numbers for each question on the RTP Checklist with their Final RTP submission.</p>	<p>Comment noted. SCAG will include specific page numbers for each question on the regional transportation plan (RTP) Checklist with the final Connect SoCal 2024 submission.</p>

ID	COMMENT	RESPONSE
0001759.02.1	<p>Caltrans Headquarters HQ Office of Regional Planning and HQ Air Quality Branch Consultation and Cooperation:</p> <ul style="list-style-type: none"> • (1.x) Please expand the RTP/Public Participation and Consultation Technical Report to further explain how SCAG periodically reviews the effectiveness of its procedures and strategies contained in the participation plan to ensure a full and open participation process. 	<p>Comment noted. The Public Participation and Consultation Technical Report includes more detail about SCAG's overall public participation program, which involves updating its federally mandated Public Participation Plan (PPP) prior to each cycle. Through this process, SCAG re-evaluates how to guide all outreach work undertaken by the agency. The updated PPP then guides the next cycle of outreach for the next update of Connect SoCal.</p>
0001759.02.2	<ul style="list-style-type: none"> • (5) Please expand on which specific agencies SCAG consulted with for land use, natural resources, environmental protection, conservation, and historic preservation. 	<p>As required in the 2017 Regional Transportation Plan Guidelines for Metropolitan Planning Organizations, SCAG reached out to federal land management agencies and the 16 federally recognized Tribal governments in the region. The Public Participation and Consultation Technical Report is updated with additional information on agency engagement and consultation.</p>
0001759.03	<p>Caltrans Headquarters HQ Office of Regional Planning and HQ Air Quality Branch Modal:</p> <ul style="list-style-type: none"> • (4) SCAG identifies Main Book Chapter 3 as discussing the regional airport system. Airports are only covered as an implementation strategy, but not a detailed discussion within the Main Book. The Technical Reports do discuss plans for the regional airport system. • (7) SCAG identifies Main Book Chapter 3 as discussing the California Coastal Trail. This trail network is not discussed within the Main Book. The Mobility Technical Report does mention how pursuant to state law, SCAG is required to incorporate the California Coastal Trail access and completion into its regional transportation planning process, however, it is unclear how and when SCAG will be completing their portions of the Coastal Conservancy's 2003 California Coastal Trail Plan. • (9) SCAG identifies Main Book Chapter 3 as discussing the maritime transportation. Maritime is only briefly covered as an implementation strategy, but not a detailed discussion within the Main Book. The Goods Movement Technical Report does discuss new projects. 	<p>SCAG will correct these errors with the final regional transportation plan (RTP) Checklist submittal.</p>
0001759.04	<p>Financial:</p> <ul style="list-style-type: none"> • (9) SCAG list the Transportation Finance Technical Report as addressing strategies to ensure their identified Transportation Control Measure (TCMs) from the State Implementation Plan (SIP) can be implemented. Neither TCMs nor the SIP are addressed in this report. SCAG should update its checklist to reference the Transportation Conformity Analysis Technical Report, which does have discussion about the TCMs. 	<p>SCAG will correct the Regional Transportation Plan (RTP) Checklist to refer to the Transportation Conformity Analysis Technical Report with the final Connect SoCal 2024 submission.</p>
0001759.05.1	<p>Transportation Conformity Analysis:</p> <ul style="list-style-type: none"> • There is a typo in section 2.3 Vehicle Registrations (p.17); See November 15, 2221. 	<p>Text is revised from "November 15, 2221" to "November 15, 2022".</p>
0001759.05.2	<ul style="list-style-type: none"> • (93.102) We were unable to locate information pertaining to the applicable pollutants and the maintenance area in the Executive Summary. Please confirm inclusion on the page column. The other sections did include the required information for this regulation. 	<p>The sentence "Connect SoCal 2024 is subject to transportation conformity requirements for three criteria air pollutants: Carbon Monoxide, Ozone, and Particulate Matter (PM2.5 and PM10) in all nonattainment and maintenance areas within the SCAG region" is added in the Executive Summary. A page reference to this addition "page 1" is added in the page column for 40 CFR Section 93.102 in Appendix 1: Conformity Analysis Checklist for SCAG Connect SoCal 2024 (2024 RTP/SCS).</p>
0001759.05.3	<ul style="list-style-type: none"> • (93.102) Pechanga Indian Reservation is listed as non-attainment for PM2.5. Please confirm accuracy using the EPA Green Book: https://www3.epa.gov/airquality/greenbook/anayo_ca.html 	<p>On March 19, 2021, EPA published a final approval of corrections/clarification in the Federal Register (86, FR 14832). The final approval corrects an omission from the description of the Riverside County portion of the South Coast Air Basin 2012 annual PM2.5 nonattainment area reclassified as Serious Nonattainment (85 FR 71264), language indicating that the lands of the Santa Rosa Band of Cahuilla Mission Indians and Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation are excluded from that portion of the South Coast Air Basin 2012 annual PM2.5 nonattainment area. Therefore, the reference that Pechanga Indian Reservation Portion of the South Coast Air Basin is nonattainment for the 2012 annual PM2.5 National Ambient Air Quality Standard is removed from the Transportation Conformity Analysis Technical Report, where appropriate. This removal has resulted in a correction to the number of federal nonattainment and maintenance areas in the SCAG region.</p>

ID	COMMENT	RESPONSE
0001759.05.4	<ul style="list-style-type: none"> (93.102) Please confirm accuracy of PM10 designations in Imperial County EPA Green Book: https://www3.epa.gov/airquality/greenbook/anayo_ca.html 	<p>Effective October 19, 2020, EPA issued a federal register notice to take final action approving, among other things, the State of California's request to redesignate the Imperial Valley Planning Area from nonattainment to maintenance for the PM10 NAAQS because the area meets the Clean Air Act requirements for redesignation of nonattainment areas to attainment (85 FR 58286). Therefore, the reference to Imperial County portion of Salton Sea Air Basin nonattainment and maintenance for PM10 NAAQS is removed where appropriate. This removal has resulted in a correction to the number of federal nonattainment and maintenance areas in the SCAG region.</p>
0001759.05.5	<ul style="list-style-type: none"> (93.104 (b, c)) Include the final board adoption resolution in the final submittal package. 	<p>Comment noted. SCAG Regional Council's adoption of Connect SoCal 2024 and 2023 FTIP Amendment #23-26, including the associated transportation conformity analysis is scheduled at its regular meeting on April 4, 2024.</p>
0001759.05.6	<ul style="list-style-type: none"> (93.108) Information on fiscal constraint of that plan was also found in Chapter 4 Financial Constraints Analysis. We recommend including this reference in the 'page' column 	<p>A reference to Chapter 4, Financial Constraints Analysis, of the Transportation Conformity Analysis Technical Report is added in the page column for 40 CFR Section 93.108 in Appendix 1: Conformity Analysis Checklist for SCAG Connect SoCal 2024 (2024 RTP/SCS).</p>
0001759.05.7	<ul style="list-style-type: none"> (93.110 (a, b)) Document the date upon which the conformity analysis was begun. 	<p>As discussed in Chapter 2 of the Transportation Conformity Analysis Technical Report, the transportation conformity analysis for Connect SoCal 2024 began in June 2023. A reference indicating the start of the regional emissions analysis for Connect SoCal 2024's transportation conformity analysis is added in Chapter 2.6 of the Transportation Conformity Analysis Technical Report as well as in the page column for 40 CFR Section 93.110(a, b) in Appendix 1: Conformity Analysis Checklist for SCAG Connect SoCal 2024 (2024 RTP/SCS).</p>
0001759.06	<p>2023 FSTIP Finding:</p> <ul style="list-style-type: none"> Per the 2023 FSTIP finding and discussed in the Statewide Overall Work Program (OWP) meeting in December 2022 and subsequent individual OWP meetings, MPOs must include Performance Based Planning and Programming in its Regional Transportation Plan (RTP). <ul style="list-style-type: none"> MPOs must describe its decision-making process for prioritizing and selecting projects regionally for funding. SCAG mentions that the County Transportation Commissions (CTCs) prioritize and select projects that align with the Regional Goals, but this process needs to be open and transparent. SCAG should work with/ ensure that each of the CTCs have a clear and transparent process for selecting projects. SCAG needs to enhance their language for how they prioritize and select projects to meet the Federal Performance Measures for Performance Management (PM) 1, 2, and 3. In the Performance Monitoring Technical Report SCAG should state how they are working with the CTCs to ensure that the projects selected are also furthering the Federal Performance Measures. 	<p>Comment noted. To clarify, the 2023 FSTIP findings "recommended that Caltrans and the MPOs jointly agree upon and develop specific written provisions for cooperatively developing and sharing information related to transportation performance data, the selection of performance targets, the reporting of performance targets, the reporting of performance to be used in tracking progress toward attainment of critical outcomes for the region of the MPO (see §450.306(d)), and the collection of data for the State asset management plan for the NHS. This agreement shall be documented either as part of the metropolitan planning agreements or documented in some other means outside of the metropolitan planning agreements as determined cooperatively by Caltrans and the MPOs."</p> <p>Also, according the 2023 FSTIP findings, "Caltrans is coordinating internally to update the Planning and Programming Memorandum of Understanding (MOU) to include roles, responsibilities, and written provisions for developing and sharing information with MPOs related to transportation performance data, the selection of performance targets, and the reporting of performance targets. The MOU is expected to be finalized by December 2023." SCAG is still awaiting a draft of the updated MOU.</p> <p>The Caltrans Office of Federal Programming convened a working group comprised of representatives from several MPOs, FHWA, and FTA to determine statewide implementation of the recommendation. Beginning with the 2025 FTIPs, Caltrans requested MPOs to document that project selection is regionwide, comprehensive, and performance-based. To aid in the effort, Caltrans asked each MPO to provide a written response to questions which were prepared in consultation with the working group. The responses focused on MPO discretionary funding sources, such as Surface Transportation Block Grant (STBG) Program, Congestion Mitigation and Air Quality (CMAQ) Improvement Program, and Carbon Reduction Program (CRP).</p>
		<p>SCAG submitted detailed responses and received feedback that the responses were sufficient. It is our understanding that Caltrans will be meeting with FHWA and FTA to discuss all MPOs' responses and to obtain their concurrence. Subsequently, Caltrans will be providing instructions within the 2025 FTIP development guidance and the FTIP performance measures template to guide MPOs in documenting how their project selection process is comprehensive, regionwide, and performance-based.</p>

ID	COMMENT	RESPONSE
0001759.07	<ul style="list-style-type: none"> • SCAG does discuss how they have a list of Federal Land Management Agencies (FLMA)s which they coordinate and consult with, as appropriate. SCAG should make an effort to consult with FLMA)s during all the stages of the planning and implementation process. Please expand on how SCAG plans to explore opportunities to leverage transportation funding to support access and transportation needs of Federal Land Management Agencies (FLMA)s before transportation projects are programmed in the Federal Transportation Improvement Program (FTIP) and Federal Statewide Transportation Improvement Program (FSTIP). 	<p>Comment noted. Through the ongoing coordination and consultation with Federal Land Management Agencies, SCAG has and will continue to discuss opportunities to leverage funding to support the needs of Federal Land Management Agencies. Although the majority of the projects included in the FTIP and FSTIP are not directly selected by SCAG, we will continue to promote collaboration with FLMA)s as well as explore opportunities to leveraging those funds for which SCAG does have direct project selection authority.</p>
0001759.08	<p>HQ Office of Rail Planning and Implementation Comments on Draft Connect SoCal 2024 1. Pg33/Emerging Technology - Consider including integrated ticketing (i.e. efforts related to Cal-ITP) which is separate from ITS and focuses on linking multi-modal systems more efficiently for a better user experience that can also be more cost effective.</p>	<p>Comment noted. Connect SoCal includes the following strategy that supports building more seamless connections between transit/rail: "Mobility as a Service (MaaS): Enable a more seamless mobility experience through the implementation of MaaS. This may include leveraging Cal-ITP's support, initiating open-loop payment demonstrations, and testing shared product systems and post-payment solutions." For reference, in 2022 SCAG completed the MaaS Feasibility White Paper to study the key building blocks for successfully implementing a MaaS system in the SCAG region, which would integrate transportation services into a single mobility platform to provide competitive alternatives over private vehicles, promote universal basic mobility, encourage mode shift, and foster sustainable travel choices. The Mobility Technical Report details additional strategies (e.g., dedicated bus lanes, mobility hubs, etc.) and investments that support growth towards this vision. SCAG continues to collaborate with Cal-ITP through SCAG's Regional Transit Technical Advisory Committee on several initiatives related to fare integration and payments.</p>
0001759.09	<p>2. Pg35/Climate Action - Connection to Climate Action Plan for Transportation Infrastructure (CAPTI) is relevant. Recommend addressing how the RTP aligns with CAPTI guiding principles throughout document as appropriate. Link: https://calsta.ca.gov/subject-areas/climate-action-plan</p>	<p>Comment noted. The, "Climate Change" section, is intended to describe the challenges and pressure due to climate change in 2050 and therefore references to CAPTI here would not be appropriate. CAPTI principles (building toward an integrated, statewide rail and transit network; investing in networks of safe and accessible bicycle and pedestrian infrastructure; including investments in light, medium, and heavy-duty zero-emission vehicle (ZEV) infrastructure; strengthening our commitment to social and racial equity by reducing public health and economic harms and maximizing community benefits; making safety improvements to reduce fatalities and severe injuries of all users towards zero; assessing physical climate risk; promoting projects that do not significantly increase passenger vehicle travel; promoting compact infill development while protecting residents and businesses from displacement; developing a zero-emission freight transportation system; and protecting natural and working lands) are reflected throughout the Connect SoCal 2024 Main Book and Technical Reports, especially in regional planning policies and implementation strategies.</p>
0001759.10	<p>3. Pg46/Funding the System - Consider expanding on what innovative and strategic options may be needed (not just the need for new funding); consider exploring specific strategies for leveraging federal funds as well.</p>	<p>Comment noted. The Transportation Finance Technical Report provides further details on funding and financing strategies and associated analysis included in the financial plan. Includes detailed information on federal funding sources, as well as financing strategies that can maximize potential investments without the need for increased funding.</p>
0001759.11	<p>4. Pg62/Collaboration and Policy - Consider including reference to include crucial to supporting State goals.</p>	<p>Comment noted. Connect SoCal 2024 is crucial to supporting State goals and that is implicit with the Plan's adherence to both state and federal Regional Transportation Plan/Sustainable Communities requirements. However, given the distinction between SCAG's support of state goals and Connect SoCal 2024's meeting of state goals, this text has not been updated to avoid confusion by stakeholders.</p>
0001759.12	<p>5. Pg85/Mobility - Instead of "transportation network", consider rephrasing as "integrated multi-modal transportation network" to address/emphasize the need for integration/multi-modal; suggest additional language be included to address the need for an integrated multi-modal network.</p>	<p>Connect SoCal's mobility goal is revised to read: Mobility: Build and maintain an integrated multimodal transportation network.</p>

ID	COMMENT	RESPONSE
0001759.13	6. Pg88/Transit and Multi-Modal Integration - Recommend explaining what an integrated multimodal network includes which is not solely dependent on growth and land use patterns. Section appears to place emphasis on individual modes and needs to expand on what an integrated multimodal network includes as well as strategies (i.e. service integration; integrated ticketing; mode shift strategies, etc.).	<p>SCAG is revising the text to read: "Strategies for improving the transportation system are dependent on integration with our growth and land use patterns. The availability, access and efficiency of different modes, including transit/rail, walking, bicycling and other forms of active transportation—including driving—all depend on a close relationship with how our region uses land and how we grow. This is particularly true when it comes to improving and building a transit/rail system that can best serve people in communities throughout our region. Encouraging shifts in the modes people use also depends on the implementation of strategies supporting more seamless connections across modes, especially via first/last mile connection, those occurring between transit/rail and biking, walking, or rolling, and ensuring platforms exist to facilitate trip planning and payments."</p> <p>For reference, the prior text reads: "Strategies for improving the transportation system are dependent on integration with our growth and land use patterns. The availability, access and efficiency of different modes, including transit/rail, walking, bicycling and other forms of active transportation—including driving—all depend on a close relationship with how our region uses land and how we grow. This is particularly true when it comes to improving and building a transit/rail system that can best serve people in communities throughout our region."</p>
0001759.14	7. Pg88 - Consider identifying how specific policy's and/or strategies align with State objectives/planning documents.	Comment noted. Reference to State laws and goals, such as those included in the California Transportation Plan (CTP) 2050, are documented in the "Guiding Laws" section of the Supplementals chapter.
0001759.15	8. Pg88/System Preservation and Resilience - What are the strategies for addressing the need for system preservation and resilience? This section appears to identify the need and challenges but doesn't highlight actual strategies that need to be employed to meet this need. If this section is not intended to identify strategies, suggest the first paragraph under the main header referencing later section(s) that identify the policy (3.3) and related strategies (3.4). Also consider transit and rail here.	Comment noted. The full set of Implementation Strategies can be found in Chapter 3 of Connect SoCal. These represent near-term efforts to be undertaken by SCAG in collaboration with other agencies and local jurisdictions, that will be further specified as part of SCAG's Overall Work Program development process.
0001759.16	9. Pg89/Funding the System/User Fees - Consider not just funding sources but exploring strategies for a more efficient, integrated multi-modal network as well as strategic prioritization of project implementation, which impact the ability to fund the system. Also, strategy should include identifying opportunities to maximize leveraging federal funds. Strategies for mode-shift should also be considered.	<p>Comment noted. Connect SoCal's mobility goal is to build and maintain a robust transportation network, one that is well integrated, multimodal, and supports modal shifts. Multiple Connect SoCal strategies support this goal. Please refer to the Complete Streets and Transit and Multimodal Integration strategies.</p> <p>The Transportation Finance Technical Report provides further details on funding and financing strategies and associated analysis included in the financial plan. Includes detailed information on federal funding sources, as well as financing strategies that can maximize potential investments without the need for increased funding.</p>
0001759.17	10. Pg91/Focusing on System Efficiency - Recommend inclusion of multi-modal service integration (not just integrated pricing strategies or seamless trip planning).	Comment noted. Multimodal service integration is needed to achieve the Plan's overarching goal of leveraging the existing transportation system in more sustainable ways. This strategy is already addressed in this section, specifically: "We will continue to make substantial investment in infrastructure to improve mobility and accessibility for travelers on all modes of transport." Also: Connect SoCal includes strategies that "...leverage existing transportation infrastructure in more sustainable ways to improve multi-modal and Complete Streets planning..." Connect SoCal's strategies and investments - which aim to optimize the performance of the existing transportation system while realizing GHG emission reductions - involve both integrated pricing strategies and investments in Universal Basic Mobility (UBM), as well as increased multimodal service integration, to "help manage the system, address mobility inequities, improve travel choices and reliability, and provide travel incentives for the region to meet Plan goals."

ID	COMMENT	RESPONSE
0001759.18	11. Pg101 - Consider discussion of complete streets and access to transit with the TPAs.	The sentence: "TPAs are where transit-oriented development (TOD) can be realized – where people can live, work and play in higher-density, compact communities with ready access to a multitude of safe and convenient transportation alternatives." is updated to: "TPAs are where transit-oriented development (TOD) can be realized – where people can live, work and play in higher-density, compact communities that are conducive to complete streets that facilitate access to high frequency transit with safe and comfortable walking and biking networks."
0001759.19	12. Pg109/Clean Transportation - This section should address strategic investments for transit and rail, not just passenger vehicles.	<p>Comment noted. The development of regional Transit Asset Management (TAM) targets (detailed in the Mobility Technical Report's Transit/Rail Chapter) included consideration of the CARB Innovative Clean Transit (ICT) regulation (Cal. Code Regs. Tit. 13 § 2023.1), which requires all transit agencies to transition to 100 percent zero emission bus (ZEB) fleets by 2040. Transit investments in the Plan incorporate consideration of and support for clean transportation for both transit and rail. The Mobility Technical Report details the region's transition to clean transit/rail in the System Preservation/Resilience discussion beginning on p. 83.</p> <p>SCAG's Clean Transportation Compendium (see: https://scag.ca.gov/post/clean-technology-compendium) is a resource for technology users, both public and private, who are faced with procurement and investment decisions, including for transit/rail operators. It is intended to function as a guiding tool for public agencies and local municipalities in establishing policies that foster the adoption and support of these technologies.</p>
0001759.20	13. Pg114 - Consider adding "Collaboration between stakeholders for scheduling and increasing ridership"	Comment noted. Within Connect SoCal, the Transit/Rail policies and strategies detailed in the Main Book and the Mobility Technical Report further support collaboration, with the goal of supporting increased transit ridership. For example, Connect SoCal includes as an Implementation Strategy, "Improve transit/rail frequency, reliability, and fare and scheduling integration across operators."
0001759.21	14. Pg114/Transit and Multi Modal Integration - Service integration is needed, not just connectivity.	Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas. The Mobility Technical Report details the strategies (e.g., dedicated bus lanes, mobility hubs, etc.) and investments that support growth towards this vision. The specific Transit/Rail strategy that supports service integration reads: "Expand the region's dedicated lanes network—including new bus rapid transit, dedicated bus lanes, express bus service on managed and express lanes—as well as the region's urban and passenger rail network and transit/rail signal priority treatments. Improve transit/rail frequency, reliability, and fare and scheduling integration across operators."
0001759.22	15. Pg114/Transit and Multi Modal Integration - Service integration between modes is also needed (i.e. timing of connections not just connections).	Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas. The Mobility Technical Report details the strategies (e.g., dedicated bus lanes, mobility hubs, etc.) and investments that support growth towards this vision. The specific Transit/Rail strategy that supports service integration reads: "Expand the region's dedicated lanes network—including new bus rapid transit, dedicated bus lanes, express bus service on managed and express lanes—as well as the region's urban and passenger rail network and transit/rail signal priority treatments. Improve transit/rail frequency, reliability, and fare and scheduling integration across operators."
0001759.23	16. Pg152/Funding/Investment Strategies - Suggest including strategies for how to most effectively leverage federal funds.	Comment noted. The Transportation Finance Technical Report provides further details on funding and financing strategies and associated analysis included in the financial plan. Includes detailed information on federal funding sources, as well as financing strategies that can maximize potential investments without the need for increased funding.

ID	COMMENT	RESPONSE
0001762.01	<p>HQ Office of Corridor and System Planning (System Planning Branch) Comments on Draft Connect SoCal 2024 Chapter 1: Executive Summary • Pg 9 - Addressing Regional Challenges: How are Natural Disaster Vulnerability: Wildfires and Earthquakes impacts addressed in this plan? Southern California is prone to wildfires and earthquakes. Preparing for and mitigating the impact of these natural disasters requires ongoing efforts in urban planning, infrastructure resilience, and emergency response. We recommended to add to in Plan Goals; Sustainability Goals: Focus on sustainability, including measures to reduce greenhouse gas emissions, improve air quality, and promote alternative transportation modes. Public Engagement: Inclusion of public input and stakeholder engagement throughout the planning process to ensure that community perspectives are considered.</p> <p>Suggested Action: Would like to see how these are addressed.</p>	<p>Comment noted. Preparing for and mitigating the impacts of natural disasters and other shocks and stressors are addressed in the Land Use and Communities Technical Report.</p>
0001762.02	<p>Pg 12 – Addressing Regional Challenges: How are Natural Disaster Vulnerability: Wildfires and Earthquakes impacts addressed in this plan? Southern California is prone to wildfires and earthquakes. Preparing for and mitigating the impact of these natural disasters requires ongoing efforts in urban planning, infrastructure resilience, and emergency response. We recommended to add to in Plan Goals; Sustainability Goals: Focus on sustainability, including measures to reduce greenhouse gas emissions, improve air quality, and promote alternative transportation modes. Public Engagement: Inclusion of public input and stakeholder engagement throughout the planning process to ensure that community perspectives are considered.</p> <p>Suggested Action: Would like to see how these are addressed.</p>	<p>Comment noted. Preparing for and mitigating the impacts of shocks and stressors, along with how public engagement plays an important role in planning for resilience, are addressed in the Land Use and Communities Technical Report.</p>
0001762.03	<p>Chapter 2: Our Region Today • Pg 34 - Consider changing Innovative Clean Transit Rule to Innovative Clean Transit regulation. Suggested Action: Change from rule to regulation • Pg 46 - Consider changing California's Advanced Clean Cars II rule to California's Advanced Clean Cars regulation. Suggested Action: Change from rule to regulation</p>	<p>Comment noted.</p>
0001762.04.1	<p>Chapter 3: The Plan • Pg 80 - It may be helpful to add income data or some type of economic data on demographic groups if available. This can highlight the need for investment in transportation infrastructure. Suggested Action: Census Data would be helpful</p>	<p>Section 9 of the Equity Analysis Technical Report includes median hourly wage, unemployment, and working poor by race and ethnicity in the SCAG region.</p>
0001762.04.2	<p>• Pg 90 - Considering adding how projects are aligned with CAPTI</p>	<p>Comment noted. CAPTI is referenced in Connect SoCal 2024 and influenced the projects, policies, and strategies included in the Plan. California State Transportation Agency guidance on CAPTI notes that MPOs are not required to modify projects list to align with CAPTI. Given the highly competitive nature of the programs affected by CAPTI, projects that are not in alignment with the CAPTI Investment Framework may not be as competitive.</p>
0001762.04.3	<p>• Pg 91 - Consider adding how FIX-it first approach established in SB1 is in alignment with CAPTI framework. Emphasize build alternatives on reducing GHG/VMT.</p>	<p>Comment noted. Although SCAG's focus on "Fix-It-First" predates both SB 1 and CAPTI, we recognize the alignment. See the regional planning policies for examples of efforts supportive of reducing GHG emissions and VMT.</p>
0001762.04.4	<p>• Pg 92 - Is it Possible to add improved times of corridors where ITS and Express Lanes have improved safety, congestion?</p>	<p>Comment noted. This section of Chapter 3 is not intended to discuss performance for any of the strategies.</p>

ID	COMMENT	RESPONSE
0001762.04.5	<ul style="list-style-type: none"> Pg 124-129 - List the Qualitative/Quantitative metrics that would address CAPTI principles and compliance 	<p>CAPTI principles (building toward an integrated, statewide rail and transit network; investing in networks of safe and accessible bicycle and pedestrian infrastructure; including investments in light, medium, and heavy-duty zero-emission vehicle (ZEV) infrastructure; strengthening our commitment to social and racial equity by reducing public health and economic harms and maximizing community benefits; making safety improvements to reduce fatalities and severe injuries of all users towards zero; assessing physical climate risk; promoting projects that do not significantly increase passenger vehicle travel; promoting compact infill development while protecting residents and businesses from displacement; developing a zero-emission freight transportation system; and protecting natural and working lands) are reflected throughout the Connect SoCal 2024 Main Book and Technical Reports, especially in Regional Planning Policies and Implementation Strategies.</p>
0001762.04.6	<ul style="list-style-type: none"> General Comment - Consider adding a dedicated map illustrating bike networks/trails 	<p>Comment noted. Bikeway maps are in the Mobility Technical Report; see Maps 3-2 to 3-7 and Appendix 8 and 9.</p>
0001762.05.1	<p>Chapter 4: Financial Summary</p> <ul style="list-style-type: none"> Pg 139 - Figure 4.1 Shows 22% New Revenue. Where is this expected new revenue coming from? Are these from new federal funding opportunities or upcoming/new local tax measure revenues? Or is this just a speculation or expectation? <p>Suggested Action: We recommend to provide a brief detail or at least one example of where the new revenue is coming from, if known. (IIFA, Road Usage Charge, etc.)</p>	<p>Comment noted. Tables 4.3 and 4.4.4 provide summaries of all included new reasonably available revenues. The Transportation Finance Technical Report provides greater detail on the SCAG financial plan and revenue sources.</p>
0001762.05.2	<ul style="list-style-type: none"> Pg 144 - Figure 4.3 The graph only shows annual inflation to 2019. Is there a more recent or updated information that includes 2022 or 2023? <p>Suggested Action: We recommend to update or include a more recent information on annual inflation between 2020-2022.</p>	<p>Comment noted. The Connect SoCal 2024 financial plan uses 2019 as a base year to maintain consistency among SCAG modelling analyses.</p>
0001762.05.3	<ul style="list-style-type: none"> Pg 145 - Figure 4.4 The graph only shows Construction Cost Index to 2019. Please include the recent 2022 Caltrans Construction Cost Index in the graph. See: https://ppmoe.dot.ca.gov/des/oe/contractor-info.html <p>Also, please indicate and clarify in the Y -axis of the graph if the value is in dollar amount millions or thousands.</p> <p>Suggested Action: We recommend to include the recent 2022 Caltrans Construction Cost Index in the graph: https://ppmoe.dot.ca.gov/des/oe/docs/CCI.pdf</p>	<p>Comment noted. The Connect SoCal 2024 financial plan uses 2019 as a base year to maintain consistency among SCAG modelling analyses.</p>
0001762.06.1	<p>Comments on Transportation Conformity Analysis Technical Report</p> <ul style="list-style-type: none"> Pg 11 - That would be great if the document brought some text regarding health in explanation and impact and benefit. <p>Suggested Action: We recommend to include the recent 2022 Caltrans Construction Cost Index in the graph: https://ppmoe.dot.ca.gov/des/oe/docs/CCI.pdf</p>	<p>For information on air pollution-related public health performance measure, refer to the Connect SoCal 2024 Performance Monitoring Technical Report. A reference to the Performance Monitoring Technical Report is added in the Executive Summary of the Transportation Conformity Technical Report.</p>
0001762.06.2	<ul style="list-style-type: none"> Pg 16 - Provide data about disadvantaged communities 	<p>As discussed in Executive Summary of the Transportation Conformity Analysis Technical Report, for information on air quality related equity including the analysis of Plan's potential emissions impacts on demographic groups, refer to the Equity Analysis Technical Report.</p>
0001762.06.3	<ul style="list-style-type: none"> Pg 21_Population Synthesis - Control variables, representing specific household and person attributes of interest, guide the synthesis process. This methodology allows the creation of a synthetic population for the entire SCAG region, offering a comprehensive dataset for regional planning. The significance of Population Synthesis becomes pronounced in scenarios where obtaining detailed, real-world data for the entire population is impractical or costly. 	<p>Comment noted.</p>
0001762.06.4	<ul style="list-style-type: none"> Pg 22_Model Output - Predicts the time of day individuals choose to travel based on factors like work schedules, congestion patterns, and personal preferences. It helps in understanding and managing peak-hour congestion. 	<p>Comment noted.</p>
0001762.06.5	<ul style="list-style-type: none"> Pg 22_Model Output - Parking Choice Sub-Model: Predicts the parking choices individuals make, considering factors such as availability, cost, and convenience. It's relevant for understanding parking demand and managing parking infrastructure. 	<p>Comment noted. Parking is discussed under Work Purposed Travel Reductions in Chapter 2.6.1, Regional Travel Demand Model Overview, of the Transportation Conformity Analysis Technical Report.</p>

ID	COMMENT	RESPONSE
0001762.07.1	<ul style="list-style-type: none"> Pg 24 - Overall, the outlined milestones demonstrate a well-structured and inclusive process for developing regional growth forecasts, ensuring data accuracy, expert validation, and meaningful engagement with local stakeholders. 	Comment noted.
0001762.07.2	<ul style="list-style-type: none"> Pg 33 - Flexible Work Schedules: Offering flexible work schedules, such as staggered work hours or compressed workweeks, provides employees with options to avoid peak commuting times and reduce overall travel. 	Comment noted.
0001762.07.3	<ul style="list-style-type: none"> Pg 33 - Encouraging Active Transportation: Promoting walking, cycling, or other forms of active transportation can contribute to reducing work-related travel, especially for short-distance commutes. <p>Public Transportation Initiatives: Supporting and investing in public transportation infrastructure can encourage employees to use public transit, reducing the number of individual car commutes.</p>	Comment noted.
0001762.07.4	<ul style="list-style-type: none"> Pg 62 – Smart Growth Initiatives: Implementing smart growth strategies that promote compact, mixed-use development to reduce the need for extensive vehicle travel and encourage transit-oriented development. <p>Electric Vehicle (EV) Infrastructure: Installing and expanding electric vehicle charging infrastructure to encourage the use of electric vehicles and reduce emissions from traditional gasoline-powered vehicles.</p> <p>Green Roofs and Cool Pavements: Incorporating green roofs and cool pavement technologies to mitigate the urban heat island effect and improve air quality in densely populated areas.</p>	For related information on smart growth, urban heat islands, and heightened health risks from worsening air quality and extreme heat, refer to the Connect SoCal 2024 Land Use and Communities Technical Report. For related information on EV infrastructure, refer to the Connect SoCal 2024 Mobility Technical Report.
0001762.07.5	<ul style="list-style-type: none"> Pg 63 – Smart Growth Initiatives: Implementing smart growth strategies that promote compact, mixed-use development to reduce the need for extensive vehicle travel and encourage transit-oriented development. <p>Electric Vehicle (EV) Infrastructure: Installing and expanding electric vehicle charging infrastructure to encourage the use of electric vehicles and reduce emissions from traditional gasoline-powered vehicles.</p> <p>Green Roofs and Cool Pavements: Incorporating green roofs and cool pavement technologies to mitigate the urban heat island effect and improve air quality in densely populated areas.</p>	Refer response to Comment ID 0001762.07.4.
0001762.08.1	<p>Comments on Congestion Management Technical Report</p> <ul style="list-style-type: none"> Pg 5 - We suggest to provide the name of the California law that was passed in 1990. <p>Suggested Action: Consider the ballot tittle "Traffic Congestion Relief and Spending Limitation Act of 1990" or "California Proposition 111."</p>	<p>SCAG is revising the text to read: "Under California Proposition 111 passed in 1990, urbanized areas must prepare a Congestion Management Program."</p> <p>For reference, the prior text reads: "Under California law passed in 1990, urbanized areas must prepare a Congestion Management Program."</p>
0001762.08.2	<ul style="list-style-type: none"> Pg 14 - The draft mentions that level of service (LOS) is used to measure performance in each county Congestion Management Plan/, what are SCAG's plans to address the State's CAPTI and SB 743 goals to use VMT as a criterion instead of LOS for roadway performance? <p>Suggested Action: Could include how SCAG plans to promote the transition from LOS to VMT as a measure for roadway performance in CMPs and other policies and practices.</p>	Please see Table 1 in the Congestion Management Technical Report, which includes the 25 performance measures SCAG uses, which includes VMT. As noted in the mentioned section, LOS is required by California Government Code for county congestion management programs, including for determining performance of the designated highway and roadway network.
0001762.09.1	<p>Comments on Performance Monitoring Technical Report</p> <ul style="list-style-type: none"> Pg 23 - Consider explaining how project delays or funding delays may affect the outcome of the models and SCAG has a solution or contingency plan 	Comment noted. In developing the methodological parameters for our 2050 regional performance assessment of Connect SoCal 2024, SCAG makes the assumption that all projects, programs, and strategies included in the Plan are fully implemented by that time. This allows us to distill the impact of the Plan on regional performance relative to the baseline with all other parameters remaining unchanged.
0001762.09.2	<ul style="list-style-type: none"> General Comment - How would SCAG deal with project/funding/alignment/political delays? 	Comment noted. The Implementation Strategies highlight specific actions and areas for collaborating to address issues that might arise before the Plan is updated in four years. Connect SoCal 2024 may also be amended, if necessary. Please see the Transportation Finance Technical Report for consideration of risks to funding.

ID	COMMENT	RESPONSE
0001762.09.3	<ul style="list-style-type: none"> • General Comment - Is SCAG factoring in California electric vehicle mandate by 2035? • General Comment - Is there enough emphasis on EV charging and supporting infrastructure to accommodate the mandate or just general growth in EV users • General Comment - Consider mentioning, if true, how EV growth may positively impact environmental metrics such as air quality and resource efficiency 	<p>Comment noted. SCAG acknowledges that increases in zero emission vehicles can positively improve air quality and resource efficiency in the region. SCAG will incorporate emissions factors assumptions about the vehicle fleet into its modeling and emissions analysis, when they become available from the California Air Resources Board. Additionally, SCAG and its regional partners are actively working on enhancing zero emission vehicle charging/fueling and supporting infrastructure to meet the 2035 mandate and also support the general increase in zero emission vehicle usage.</p>
0001762.09.4	<ul style="list-style-type: none"> • General Comment - Consider referencing project(s) that are in the project list that will contribute to the significant reduction in daily per capita minutes of delay or reduction in congestion. 	<p>Comment noted. Comment noted. Projects submitted for inclusion in the Plan by the county transportation commissions reflect the needs and goals of each county. Many projects are the result of performance-based decisions at the county or district level. Additionally, the county transportation commissions provide performance details on projects that assist in SCAG's performance-monitoring process. When SCAG evaluates performance of the Plan, it does so at the regional, or system, level to consider the impacts of strategies and policies that support planned investments. Based on feedback from FHWA and FTA at SCAG's 2022 Federal Recertification, SCAG will be improving its performance-based planning and programming process to better document how the region uses a regional, performance-based, uniform approach to prioritize and select projects.</p>
0001762.09.5	<ul style="list-style-type: none"> • General Comment - Priority Development areas list, consider adding how SCAG will prioritize transportation funding over the 20 years 	<p>Comment noted. The program guidelines for federal transportation dollars under SCAG's direct control include evaluation criteria to help ensure that investments are directed and/or benefit such areas.</p>
0001762.10.1	<p>Comments on Mobility Technical Report</p> <ul style="list-style-type: none"> • Pg 6 - Tables 1-2 and 1-3 do not capture significant and positive changes for other modes of transportation. There is no significant reduction in average commute distance by auto in 2050 compared to base year, and no increases in average distances by active transportation modes either. Primarily concerned that if these are the initial modelling results, the connect SOCAL 2024 plan may not achieve impactful changes for California's mobility. <p>Suggested Action: If the results hold, overall implementation strategies may need to be looked over. To achieve greater results beyond what the actions in this plan are capable of, legislative changes may be required.</p>	<p>Comment noted. While the modeling results indicate that average commute distance will decrease modestly (-4.8 percent) by 2050 with implementation of the Plan, there are differences in performance among the various travel modes. SCAG agrees that continued, coordinated leadership among local, regional, and state planning agencies will be required to maximize travel time reductions across all travel modes as a means for improving the efficiency and viability of non-SOV modes for work-related trips.</p>
0001762.10.2	<ul style="list-style-type: none"> • Pg 69 - Remote/Telework/Hybrid: If there is data available, it would be helpful to know what percentage of transit passengers now work remotely/telework and no longer utilize transit/rail. I assume there would be a greater number of people that utilized transit/rail in dense, urban areas, but less sure about those that live in suburban areas. <p>Suggested Action: Acquire available survey data on employment types and percentages of commuters that now work remotely, without a need to take work commute trips.</p>	<p>Comment noted. The plan document makes extensive use of American Community Survey (ACS) data (see, e.g. https://scag.ca.gov/post/american-community-survey-2022-data-release) and the Survey of Work Attitudes and Attributes (www.wfhresearch.com) to understand mode choice as it relates to telework. Per the above ACS report, "after dropping from 4.8 percent in 2012 to 3.8 percent in 2019 and 2.2 percent in 2021, the share of workers commuting to work via transit in the region increased modestly to 2.5 percent in 2022." This slight rebound coincided with a region-wide drop in working-from-home from 19.3 percent in 2021 to 15.7 percent in 2022 using the same data source. In addition, SCAG is beginning to rely upon location-based services data and integrating the recently-released 2022 National Household Travel Survey into our ongoing planning and implementation processes.</p>
0001762.10.3.1	<ul style="list-style-type: none"> • Pg 139 - Section 3.10; Could the Interregional Transportation Strategic Plan be included as a State guidance document? 	<p>The Mobility Technical Report - Active Transportation Chapter's Section 3.10 is revised to reference the California Interregional Strategic Plan. As the Strategic Plan notes: "Active transportation modes, such as bicycling and walking, along with local and regional rail transit, are significant elements of California's transportation network that feed into the interregional system. Supporting active transportation and local transit can improve first and last mile connections to regional intercity and high-speed rail, leading to increased multimodal interregional options."</p>

ID	COMMENT	RESPONSE
0001762.10.3.2	Suggested Action: Acquire available survey data on employment types and percentages of commuters that now work remotely, without a need to take work commute trips.	Comment noted. The plan document makes extensive use of American Community Survey (ACS) data (see, e.g. https://scag.ca.gov/post/american-community-survey-2022-data-release) and the Survey of Work Attitudes and Attributes (www.wfhresearch.com) to understand mode choice as it relates to telework. Per the above ACS report, "after dropping from 4.8 percent in 2012 to 3.8 percent in 2019 and 2.2 percent in 2021, the share of workers commuting to work via transit in the region increased modestly to 2.5 percent in 2022." This slight rebound coincided with a region-wide drop in working-from-home from 19.3 percent in 2021 to 15.7 percent in 2022 using the same data source. In addition, SCAG is beginning to rely upon location-based services data and integrating the recently-released 2022 National Household Travel Survey into our ongoing planning and implementation processes.
0001762.10.4	• Pg 152 - Suggestion is to include a graph that would project Pedestrian Fatalities and Serious Injuries if actions weren't taken.	Comment noted. SCAG uses historical data provided through statewide and national traffic incident databases to support the transportation safety performance graphics provided in Connect SoCal. Unfortunately, we are not able to provide scenario-based future projections at this time for pedestrian-related incidents.
0001762.10.5	• Pg 153-155 - If the outcome is to reduce speed limits to increase chance of survival for vehicle and pedestrian collision, how will this impact travel times? Suggestion would be (if possible) include a graph that shows impact to travel times and speed limit reductions (per area)	Comment noted. The effect of reducing vehicle speeds on vehicle travel times is dependent on corridor-specific factors (e.g. proposed design and/or if/how people change travel patterns) and would be difficult to evaluate given the lack of consistently available data across the region and likely inaccurate to estimate on a regional level.
0001762.10.6	• Pg 155 (3.12.3) - Provide graph that shows injuries in areas that lack infrastructure.	Comment noted. Information on infrastructure gaps is not consistently available for the whole region, and this type of analysis is more feasible for a local jurisdiction or focused project area as identifying infrastructure gaps may require data collection through field observations and/or aerial imagery to assess detailed existing conditions.
0001762.10.7	• Pg 157 - If available, provide graph showing an increase/decrease collision related data involving motor vehicles. Is the increase/decrease due to Micromobility options such as e-scooters/bikes? Besides allowing access, what are other benefits to the community/ region.	Comment noted. Current collision data have limited information about micromobility modes as the detail of reporting depends on the discretion of the reporting officer. In addition, studies would be necessary to explore the relationship between motor vehicle collision trends and micromobility ridership trends rather than solely comparing motor vehicle trends and micromobility ridership trends. The first sentence of 3.12.4 lists the benefits of micromobility: "Micromobility has emerged as a significant trend in active transportation in Southern California, offering alternative modes of travel that are accessible, environmentally friendly, and well-suited for shorter trips."
0001762.10.8	• Pg 162 - Provide graph illustrating survey results and Planning Priorities for the next 20+ years.	The full survey results can be found in "Public Outreach Findings" section of the Public Participation & Consultation Technical Report. The text in the Mobility Technical Report has been updated to cross-reference the Public Participation & Consultation Technical Report.
0001762.10.9	• Pg 163 - Goals listed support CAPTI	Comment noted. While many of the goals in Connect SoCal are in alignment with State goals, plans, and policies, such as the Climate Action Plan for Transportation Infrastructure (CAPTI), the Plan does not specify every related plan or policy.
0001762.11.1	Comments on Mobility Technical Report • Pg 166-171 - Provide detail that shows area of travel for the proposed network. (Type of road, condition, area, lighting, etc.)	Comment noted. Information about the road conditions, surrounding area, lighting, and other contextual factors is not consistently available for the whole network and this additional detail would render the maps illegible.
0001762.11.2	• Pg 172 - Nearly half of all jurisdictions have adopted a Complete Streets policies and strategies through their general plan.	Comment noted. The Mobility Technical Report specifies that nearly half of all jurisdictions have adopted a Complete Streets policies and strategies through the circulation or mobility elements of their General Plans.
0001762.11.3	• Pg 174 - When widening sidewalks, is there a standard to the minimum width of a bike lane, parking lane, and street lane? The first paragraph calls for the widening of sidewalks. But default will this also shift all infrastructure creating less space for vehicles? Is there a study being included to ensure the projects (Complete Streets) aren't becoming confined spaces.	Comment noted. The reference to widening sidewalks is for the specific example for the Pacific Coast Highway Streetscape project in Huntington Beach rather than suggesting all complete streets projects would widen sidewalks. Each project is unique and will be shaped by community outreach and local design standards around sidewalk, bike lane, parking lane, and travel lane widths in addition to State and federal standards, such as the California and Federal Manual on Uniform Traffic Control Devices and the Americans with Disabilities Act.

ID	COMMENT	RESPONSE
0001762.11.4	<ul style="list-style-type: none"> Pg 177 - Paragraph two mentions shifting short trips to walking modes. In areas where suggested, shade canopies (trees) should be included in the designs 	<p>"Providing complete sidewalk networks allows for safe travel for walking and rolling trips and encourages walking and rolling for a variety of short trip purposes." is updated to: "Providing complete sidewalk networks and amenities, such as landscaping and trees, allow for safe and comfortable travel for walking and rolling trips and encourage walking and rolling for a variety of short trip purposes."</p>
0001762.11.5	<ul style="list-style-type: none"> Pg 178 - Paragraph one mentions the removal of vehicle lanes. Has or is a study projected to be completed to show traffic impacts with the removal of vehicle lanes. 	<p>The last sentence of the paragraph is updated to reference the need for studies, in addition to community outreach, to understand the impacts of roadway design alternatives. The sentence is updated from, "This is when intensive and supportive community outreach proves helpful." to, "This is when intensive and supportive community outreach and studies to understand the effects of proposed roadway designs prove helpful."</p>
0001762.11.6	<ul style="list-style-type: none"> Pg 178 - Paragraph two mentions local jurisdictions can pursue implementing "Slow Streets". It is mentioned "Quick Builds" may be part of the process when determining, but what is the deciding factor. 	<p>Slow Streets, quick build projects, and demonstration events are mentioned as approaches to implement pedestrian and bikeway infrastructure. The introductory sentence for quick builds is updated from: "It is worth noting that in some cases, it may make sense for local jurisdictions to pursue development of Quick Build projects, which were described earlier, but refer to interim capital improvement projects that typically include active transportation components." to: "Local jurisdiction may also implement or enhance walking and bicycling infrastructure with Quick Build projects, which were described earlier, but refer to interim capital improvement projects that typically include active transportation components."</p>
0001762.11.7	<ul style="list-style-type: none"> Pg 183, Section 3.16 - How will SCAG Support? - Outreach was done earlier to prioritize planning projects. But prior to carrying out the projects, will SCAG, the Local Agency, and Caltrans work together to begin to prioritize projects to be implemented. 	<p>Comment noted. As described in the introduction of 3.16, SCAG understands that progress towards achieving regional goals will be made primarily through implementation at the local level. As noted in section 3.16.3, to support local implementation, SCAG is assisting in the distribution and administration of California's Active Transportation Program funding and providing active transportation planning technical assistance to support the development of plans, projects, or programs that implement the key strategies described in the Mobility Technical Report.</p>
0001762.11.8	<ul style="list-style-type: none"> General Comment - After reviewing the Active Transportation (Chapter 3) section of the SoCal Mobility report, there were no suggested recommendations. As shared, the previous part was strictly the history, definitions/examples, and plans and projects that were either completed or underway. Further into the document it began to address what the issue was, examples of projects that can assist the Local Agency/region on combating the issue, and what SCAG role will be throughout the process. The only suggestion I that could be beneficial would be for SCAG to adopt the 8-Step Corridor Planning Process. 	<p>Comment noted. SCAG values and, while not explicitly noted in the Plan, applies the 8-Step Corridor Planning Process to its work and projects it manages (i.e., scoping effort, gathering information, conducting baseline performance assessments, identifying potential projects, analyzing improvement strategies, selecting and prioritizing solutions, publishing a plan, and evaluating progress).</p>
0001762.11.9	<ul style="list-style-type: none"> Appendix 4 - It would be helpful to provide frequency of monitoring plan goals, or a schedule on how to ensure strategies are being effectively implemented by each responsible party in the connect SOCAL 2024 plan. Suggested Action: Provide "quality management plans" by each responsible party on how they plan to achieve plan goals and deliver strategies to achieve the greater RTP/MTP goals 	<p>Comment noted. The full set of Implementation Strategies can be found in Chapter 3 of Connect SoCal. These represent near-term efforts to be undertaken by SCAG in collaboration with other agencies and local jurisdictions, that will be further specified as part of SCAG's Overall Work Program development process, which is reported on a quarterly and annual basis to Caltrans.</p>
0001762.12.1	<p>Comments on Demographics and Growth Forecast Technical Report</p> <ul style="list-style-type: none"> Pg 7 - Table 2: Would be helpful to know how the employment changes are distributed across different labor categories. 	<p>The employment projection by 2-digit NAICS industry sector can be found in Table 6 of the Demographics & Growth Forecast Technical Report.</p>

ID	COMMENT	RESPONSE
0001762.12.2	<ul style="list-style-type: none"> Pg 11 - Table 3: For the county-to-county migrations expected to occur, are there ongoing regional efforts to respond to the changes in population/households/employments within the SCAG region? Are there enough jobs in different categories available for new migrants into the SCAG counties? 	<p>As described in section 3.3, employment has rebounded substantially since COVID lows, with unemployment rates near historic lows as well. Consistent with the Connect SoCal forecast's long-range expectations, age-specific labor force participation and double-jobbing are anticipated to increase. Historically Southern California has higher labor force participation than the nation as a whole, owing in part to higher cost of living but also due to the strong economic base comprised of traded industry sectors. Put simply, it is difficult to envision Southern California's growth in economic base or traded sectors to be slower than that of the nation as a whole. However, by 2022—and continuing into 2023—regional employment has roughly matched pre-pandemic levels despite the fact that the population declined markedly over the same period (discussed in Section 3.1). This suggests that a long-run expectation of high labor demand is supported. Furthermore, as shown in Table 2, the current data and expert insights undergirding the forecast support the slight improvement in jobs-housing balance across the region's counties.</p>
0001762.13.1	<p>Comments on Project List Technical Report</p> <ul style="list-style-type: none"> Pg 411 - The High Desert Corridor Operational Efficiency project is planned to be submitted for TCEP funds, SB 1 Cycle 4 and is listed in the draft Connect SoCal 2024. <p>Suggested Action: Please make sure project (RTP ID 5240011) is also included in the final version of the Connect SoCal 2024.</p>	<p>RTP ID #5240011 will remain in the Final Project List Technical Report without any changes.</p>
0001762.13.2	<ul style="list-style-type: none"> Pg 265 - The Pennsylvania Avenue Grade Separation project is planned to be submitted for TCEP funds, SB 1 Cycle 4 and is listed in the draft Connect SoCal 2024. <p>Suggested Action: Please make sure project (RTP ID RIV180129) is also included in the final version of the Connect SoCal 2024.</p>	<p>RTP ID #RIV180129 will remain in the Final Project List Technical Report. The project has been updated to reflect how it is programmed in the currently approved FTIP.</p>
0001762.13.3	<ul style="list-style-type: none"> Pg 110 - The Scott Road/Bundy Canyon Road Widening project is planned to be submitted for TCEP funds, SB 1 Cycle 4 and is listed in the draft Connect SoCal 2024. <p>Suggested Action: Please make sure project (RTP ID RIV180140) is also included in the final version of the Connect SoCal 2024.</p>	<p>FTIP ID #RIV180140 in Table 1 is reflected in the Financially Constrained Projects list Table 2 under RTP ID#3A01WT207. It will remain the Final Project List Technical Report without any changes.</p>
0001762.13.4	<ul style="list-style-type: none"> Pg 120 - The McCall Boulevard/I-215 Interchange project was submitted for TCEP funds, SB 1 Cycle 4 and is listed in the draft Connect SoCal 2024. <p>Suggested Action: Please make sure project (RTP ID RIV151218) is also included in the final version of the Connect SoCal 2024.</p>	<p>The McCall Boulevard/I-215 Interchange project is included in the Draft and Final Connect SoCal 2024 Project List Technical Report under RTP ID #3M0719. It is reflected in Table 1 under FTIP #RIV151218, which is its assigned FTIP ID.</p>
0001762.13.5	<ul style="list-style-type: none"> Pg 410 - The Desert Rail Infrastructure Improvement project is planned to be submitted for TCEP funds, SB 1 Cycle 4 and is listed in the draft Connect SoCal 2024. <p>Suggested Action: Please make sure project (RTP ID 5240010) is also included in the final version of the Connect SoCal 2024.</p>	<p>Comment noted. RTP ID #5240010 is included in the Draft and will be included in the Final Connect SoCal-2024 RTP/SCS.</p>
0001762.13.6	<ul style="list-style-type: none"> Pg 146 - The Autonomous, Zero-Emission Transit Tunnel to Ontario International Airport project is planned to be submitted for SCCP funds, SB 1 Cycle 4 and is listed in the draft Connect SoCal 2024. <p>Suggested Action: Please make sure project (RTP ID 20192702) is also included in the final version of the Connect SoCal 2024.</p> <ul style="list-style-type: none"> General Comment - We recommend to include in the final document all potential projects nominated for SB1 program by Caltrans and local agencies. <p>Suggested Action: Please make sure to include in the final document all potential projects nominated for SB1 program by Caltrans and local agencies.</p>	<p>Please note that the project is included in the in Table 2 under RTP ID #4160049. Its FTIP ID is #20192702. The project is included in the Draft and Final Connect SoCal 2024. Project List inclusions and modifications are reflected as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.</p>
0001762.14.1	<p>Caltrans District 7 District 7 Climate Change Adaptation General Comments on Draft Connect SoCal 2024</p> <p>1. We'd like to commend SCAG's RTP for providing a comprehensive overview of the conditions and challenges facing the region. The RTP also provides an extensive list of resources for local agencies and partners to use. The Sustainable Communities list can help inspire ideas from other agencies to develop their own applications and projects.</p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001762.14.2	2. We'd like to commend SCAG's RTP for highlighting the Digital Divide, especially for low-income households in the community. The digital divide creates unequal access to opportunities for these households. For example, lack of internet access can not only limit viability to certain jobs that are hybrid/telework, forcing them to physically travel to work leading to increased transportation costs for households and regional emissions. It can also limit informational access to warnings regarding climate hazards and extreme weather events. Caltrans is helping the State and Region bridge the Digital Divide through Digital Equity Workshops and installation of fiber optics through and along State Facilities.	Comment noted.
0001762.14.3	3. Section 2 covers both Environment and Economy. It would be great to provide a small paragraph that showcases how much the money the Region could save by investing in Resilient infrastructure instead of letting the Climate Hazards occur and damage infrastructure/communities.	Comment noted. SCAG has not yet conducted analysis on the cost savings by investing in resilient infrastructure.
0001762.15	<p>District 7 Multi-Modal System Planning Comments on Draft Connect SoCal 2024 Chapter 1: Executive Summary</p> <ul style="list-style-type: none"> • Pg 8 (Accessible) - Safety has become a deterrent to ridership. Conflicting local policies are part of the problem and need to be addressed. • Pg 9 (Mobility) - Transit ridership continues to decline despite billions of dollars in investment. A large part of the plan is for investment in transit when it accounts for only a small fraction of trips. • Pg 9 (Mobility) - EV's weigh more than gasoline powered vehicles thus doing more damage to roads. They should be taxed accordingly, including at the charging station. • Pg 10 (Economy) - Ironically, high income areas often have poorer access to transit because of their lower-density nature. Lower income areas often have better transit access due to higher density and ridership productivity. 	<p>Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas. The Mobility Technical Report details the strategies (e.g., transit/rail safety, dedicated bus lanes, mobility hubs, etc.) and investments that support growth towards this vision.</p> <p>Connect SoCal acknowledges that work needs to be done to support an equitable transition to a user fee system. SCAG's key guiding principles for financial strategies includes establishing a user-based system that better reflects the true cost of transportation, provides firewall protection for new and existing transportation funds, and ensures an equitable distribution of costs and benefits. This could include exploring issues like vehicle weight.</p>
0001762.16.01	<p>District 7 Multi-Modal System Planning Comments on Draft Connect SoCal 2024 Chapter 2: Our Region Today</p> <ul style="list-style-type: none"> • Pg 34 (Shared Mobility) - Ride sharing services may have also impacted transit ridership. They can be a more attractive option in off-peak hours. 	Comment noted.
0001762.16.02	<ul style="list-style-type: none"> • Pg 34 (ITS – real-time traveler info systems) - These systems are very helpful to transit riders. 	Comment noted.
0001762.16.03	<ul style="list-style-type: none"> • Pg 34 (Blockchain) - Not sure how much different this is than using credit cards and digital wallets? 	Comment noted. Blockchain and cryptocurrencies provide decentralized, secure peer-to-peer transactions without central authority, contrasting with credit cards that, though widely accepted and backed by banks, may incur higher fees. Mobility wallets, designed for transportation services, differ in features and service range, typically relying on credit or cash-based systems.
0001762.16.04	<ul style="list-style-type: none"> • Pg 34 (Innovative Clean Transit Rule) - Is this an unfunded mandate that will make it more difficult to provide transit service? 	Comment noted. See response to Comment ID. 0001762.18.5
0001762.16.05	<ul style="list-style-type: none"> • Pg 34 (Advanced Clean Cars II rule) - ZEV's cost significantly more than other vehicles. Wouldn't this requirement have a negative impact on low-income communities? 	Comment noted. SCAG recognizes the concern about the higher cost of ZEVs being a barrier for low-income communities. However, various federal and state incentive programs are in place to address this issue. These programs are designed to lower the initial cost of ZEVs, thereby making them more attainable for low-income individuals. For instance, California's Clean Cars 4 All program provides significant rebates to reduce the purchase price for eligible consumers. Furthermore, the expanding market of pre-owned ZEVs offers an additional avenue for affordability. This growing market, alongside incentives for used ZEVs from utility, state, and federal programs, can help ease the transition for low-income communities towards cleaner transportation. As these initiatives continue to develop, they are essential in making zero-emission transportation benefits accessible to everyone, irrespective of their income.

ID	COMMENT	RESPONSE
0001762.16.06	<ul style="list-style-type: none"> Pg 35 (seismic events) - How are earthquakes related to climate change? 	<p>As summarized by NASA, climate change induced hazards, such as drought, can have impacts on seismic events: "Pumping of groundwater from underground aquifers by humans, which is exacerbated during times of drought, has also been shown to impact patterns of stress loads by "unweighting" Earth's crust. A 2014 study in the journal Nature by Amos et al. that looked at the effects of groundwater extraction in California's Central Valley on seismicity on the adjacent San Andreas Fault. The researchers found that such extractions can promote lateral changes in stress to the two sides of the San Andreas, which move horizontally against each other along the boundary of two major tectonic plates. This could potentially cause them to unclamp and slip, resulting in an earthquake"</p>
0001762.16.07	<ul style="list-style-type: none"> Pg 38 (How do we move today?) - How many miles of freeways? 	<p>Comment noted. As of 2022, the NHS within California consists of 57,699 pavement lane miles, which are owned by Caltrans, Tribal governments and/or local, state, and/or federal agencies. SCAG hosts 12,170 lane miles, or 42 percent, of locally owned NHS pavement lanes in California. For more information, please see the Mobility Technical Report for more discussion about the existing transportation system both statewide and in the SCAG region.</p>
0001762.16.08	<ul style="list-style-type: none"> Pg 38 (100 transit operators) - Metropolitan Chicago has three transit operators. 100 is far too many to be effective and impossible to coordinate. 	<p>Comment noted.</p>
0001762.16.09	<ul style="list-style-type: none"> Pg 38 (109 miles of light rail) - How many miles of heavy rail (B and D Lines)? 	<p>SCAG is revising the text to read: "We are home to an extensive transit/rail network that includes over 100 transit operators; 33,485 miles of bus routes, including local bus, express and bus rapid transit (BRT); 109 miles of local heavy and light rail, serving 108 stations; Amtrak intercity and long-distance services; and Metrolink commuter rail service, which operates on seven lines with 66 stations in five of six counties on a 546 route-mile network."</p> <p>For reference, the original text reads: "We are home to an extensive transit/rail network that includes over 100 transit operators; 33,485 miles of bus routes, including local bus, express and bus rapid transit (BRT); 109 miles local light rail, serving 108 stations; Amtrak intercity and long-distance services; and Metrolink commuter rail service, which operates on seven lines with 66 stations in five of six counties on a 546 route-mile network."</p>
0001762.16.10	<ul style="list-style-type: none"> Pg 38 (locally supported sales-tax) - The rail network also relies on state and federal funds 	<p>Comment noted. The Mobility Technical Report (Section 2.6 How Many People are Served by Transit/Rail) discusses federal, state, and local funds that support transit/rail in the region.</p>
0001762.16.11	<ul style="list-style-type: none"> Pg 43 (Transportation Safety – regional housing crisis) - This is not the only cause. Mental illness and substance abuse are probably a larger factor for security issues on transit. Almost all incidents are caused by people who do not pay their fare, so fare enforcement would be a start. 	<p>Comment noted. The Mobility Technical Report (2.14.2 Safety and Security) discusses safety and security as a transit/rail challenge. Connect SoCal includes a policy to address transit safety, which reads: "Support innovative approaches for addressing transit safety and security issues so that impacts to transit employees and the public are minimized and those experiencing issues (e.g., unhoused persons) are supported."</p>
0001762.16.12	<ul style="list-style-type: none"> Pg 43 (homelessness on transit) - Conflicting local policies and priorities are another problem. Transit and other public spaces should have rules of conduct and trespassing laws that are enforced. Other regions around the country seem to have less of a problem with these issues. 	<p>Comment noted. The Mobility Technical Report (Section 2.14.2 Safety and Security) discusses safety and security as a transit/rail challenge. Connect SoCal includes a policy to address transit safety, which reads: "Support innovative approaches for addressing transit safety and security issues so that impacts to transit employees and the public are minimized and those experiencing issues (e.g., unhoused persons) are supported."</p>
0001762.16.13	<ul style="list-style-type: none"> Pg 43 (66% of fatalities on 1.5% of network) - Might be interesting to see on a map 	<p>Comment noted. SCAG is actively developing new tools to improve our ability to identify and communicate regional traffic safety trends. One these resources is the SCAG regional High Injury Network (HIN), which identifies roadway segments that are at highest risk for collisions resulting in fatality or serious injury. To access the SCAG HIN, please visit our Transportation Safety Resource Hub at: https://scag.ca.gov/transportation-safety</p>

ID	COMMENT	RESPONSE
0001762.16.14	<ul style="list-style-type: none"> Pg 44 (A Just and Clean Transition) - These are very significant barriers. Incentives and market choices might work better than mandates. 	<p>Comment noted. Accelerating clean technology adoption likely requires a mix of mandates and incentives. Mandates play a key role in fostering a competitive environment, pushing technology providers and manufacturers to innovate and introduce new offerings. This helps align technological progress with environmental objectives.</p> <p>Concurrently, incentives are vital for boosting consumer uptake of these technologies by easing the financial impact and making the shift more attractive. Absent mandates, there's a risk of technological development falling short of environmental goals. Likewise, without incentives, there's a potential reluctance among consumers to abandon existing technologies.</p> <p>Thus, a balanced strategy incorporating both mandates for technological growth and incentives for consumer engagement is advisable to effectively promote clean technology adoption.</p>
0001762.16.15	<ul style="list-style-type: none"> Pg 55 ("primary factors leading to homelessness") – What is social? 	<p>The third paragraph under the section Key Community Challenges is changed to clarify the economic and social factors leading to homelessness.</p>
0001762.16.16	<ul style="list-style-type: none"> Pg 60 (Regulatory Requirements) - Conflicting goals. Incentives might be better for business than mandates. 	<p>Comment noted.</p>
0001762.16.17	<ul style="list-style-type: none"> Pg 66 – ("Redlands University") – University of Redlands Pg 66 (Metro E Line) – (Gold) Pg 66 ("downtown LA and Santa Monica") – East L.A. and Santa Monica 	<p>SCAG is changing text to read: "University of Redlands."</p> <p>Metro E line is "Expo" not Gold.</p> <p>SCAG is changing text to read: "East Los Angeles and Santa Monica."</p>
0001762.16.18	<ul style="list-style-type: none"> Pg 68 ("retroreflective backplates and LPI") – Referring to traffic signals? 	<p>The description of HSIP funding is updated from: "Awarded \$7.8 million in grant funds for the HSIP Cycle XI Project, which includes the installation of citywide retroreflective backplates and Leading Pedestrian Interval Phasing." to: "Awarded \$7.8 million in grant funds for the HSIP Cycle XI Project, which includes the installation of retroreflective backplates and Leading Pedestrian Interval Phasing at signalized intersections citywide."</p>
0001762.17.01	<p>District 7 Multi-Modal System Planning Comments on Draft Connect SoCal 2024 Chapter 3: The Plan</p> <ul style="list-style-type: none"> Pg 89 (Technology Integration) – Telecommuting? 	<p>Comment noted. Telecommuting is a Transportation Demand Management (TDM) strategy. For more information, please see the Congestion Management Technical Report.</p>
0001762.17.02	<ul style="list-style-type: none"> Pg 89 (Safety) - Other local public safety polices might conflict or interfere with this goal 	<p>Comment noted. SCAG recognizes that safety policies may differ depending on local contexts. However, SCAG's overarching safety goal is aligned with state and federal priorities to advance safety. More specifically, it aligns with the federal requirements that SCAG, working in partnership with Caltrans, establish transportation safety targets, and that SCAG, working in partnership with County Transportation Commissions and transit agencies, develop transit safety performance targets.</p>
0001762.17.03	<ul style="list-style-type: none"> Pg 89 (Funding the System) - Per kw tax at the charger or vehicle license fee surcharge for hybrids and ZEVs? 	<p>Comment noted. For more details on new revenue sources, please see the Transportation Finance Technical Report.</p>
0001762.17.04	<ul style="list-style-type: none"> Pg 93 (Metrolink SCORE Buildout) - Regional rail has been a missing, but vital element in the Regional Transportation System. 	<p>Comment noted.</p>
0001762.17.05	<ul style="list-style-type: none"> Pg 95 (Regional Express Lane Network) - Looks like there are still some significant gaps 	<p>Comment noted. The Regional Express Lane Network presented in Connect SoCal 2024 represents what is planned for completion through 2050. Updates to the network can be addressed through amendments or updates to the Plan as needed.</p>
0001762.17.06	<ul style="list-style-type: none"> Pg 97 (Forecasted Regional Development Pattern) - The scattered nature of ADU's seem to conflict with the PDA's and 15-Minute Community goals. 	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001762.17.07	<ul style="list-style-type: none"> Pg 100 (Priority Development Areas) - Looking at maps 3.3 and 3.4, some of the PDA's appear to be located in areas without good transit access and other infrastructure to support such growth. 	<p>Comment noted. Not all Priority Development Areas (PDAs) focus on transit access. Two types of PDAs include priorities that specifically look at transit access, such as Transit Priority Areas and Livable Corridors, while the other two PDAs look at current built environment (Neighborhood Mobility Areas) and potential future annexations (Spheres of Influence).</p>
0001762.17.08	<ul style="list-style-type: none"> Pg 101 (Transit Priority Areas) - 15-minute all-day frequency would probably be a better requirement to support a TPA. 	<p>Transit Priority Areas were defined by the State of California Senate Bill 743: "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.</p>
0001762.17.09	<ul style="list-style-type: none"> Pg 109 (Advanced Clean Cars II regulation) - This goal may be too aggressive and may need to be extended to let the market and infrastructure catch up. 	<p>Comment noted.</p>
0001762.17.10	<ul style="list-style-type: none"> Pg 109 ("higher price of electric vehicles...") - Conflict of goals? More expensive transportation could make it harder for disadvantaged communities to access jobs and other services. 	<p>Comment noted. The concern about the affordability of ZEVs for disadvantaged communities, especially in relation to job access and essential services, is valid. Addressing this, incentive programs like a PEV rebate program are key. They aim to alleviate financial barriers, making cleaner transportation options more accessible to low-income groups. Moreover, with ongoing technological advancements, it's anticipated that the cost gap between ZEVs and traditional ICE vehicles will narrow, eventually making ZEVs more feasible for a wider consumer base. Also, according to the US Dept. of Energy and others, the cost of charging a PEV is significantly lower than the cost of fueling a gasoline powered vehicle.</p>
0001762.17.11	<ul style="list-style-type: none"> Pg 115 (Policy 13) - Add Regional Rail (SCORE Program)? Much has been invested in urban light rail and subway lines, but the regional rail system has not been developed. Much of it still operates on single track, which limits service frequency and reliability. 	<p>Commented noted. The comment is in reference to strategies for Transportation System Management which are not intended to address regional rail. Several Connect SoCal strategies highlight support for transit/rail expansion. For example, the fourth strategy on p. 125 under Transit and Multimodal Integration is: "Expand the region's dedicated lanes network—including new bus rapid transit, dedicated bus lanes, express bus service on managed and express lanes—as well as the region's urban and passenger rail network and transit/rail signal priority treatments. Improve transit/rail frequency, reliability, and fare and scheduling integration across operators." SCAG coordinates with Metrolink directly on the SCORE program.</p>
0001762.17.12	<ul style="list-style-type: none"> Pg 121 (Policy 82) - Cash payment options be maintained 	<p>Comment noted.</p>
0001762.17.13	<ul style="list-style-type: none"> Pg 121 (Policy 83) - Reduce barriers, regulations, requirements and taxes that discourage businesses from locating in or remaining in the region. 	<p>Comment noted. The current policy to "foster a positive business climate" could be inclusive of the specific strategies suggested in the comment, but these details will be context dependent and may be unique to each city and county.</p>
0001762.17.14	<ul style="list-style-type: none"> Pg 125 ("Expand the region's Express Lanes network...") - Include transition of Commuter Rail to frequent Regional Rail service. No mention of eliminating single track bottlenecks or SCORE program. 	<p>There is no reference to "Expand the region's Express Lanes network" on p. 125. Several Connect SoCal strategies highlight support for transit/rail expansion. For example, the fourth strategy on p. 125 under Transit and Multimodal Integration is: "Expand the region's dedicated lanes network—including new bus rapid transit, dedicated bus lanes, express bus service on managed and express lanes—as well as the region's urban and passenger rail network and transit/rail signal priority treatments. Improve transit/rail frequency, reliability, and fare and scheduling integration across operators." SCAG coordinates with Metrolink directly on the SCORE program.</p>
0001762.17.15	<ul style="list-style-type: none"> Pg 128 (Coordinate with local, regional...") - Mileage based user fees do not account for weight and tax non-ZEV users twice. This has a negative impact on disadvantaged communities who frequently have to commute longer distances to affordable housing. 	<p>Comment noted. The draft Plan assumes substitution of mileage-based user fees for existing fuel taxes. Please see the Transportation Finance Technical Report Appendix for more details on Plan revenue sources. Additionally, please see the Equity Analysis Technical Report for an in-depth discussion on an equitable transition to mileage-based user fees.</p>

ID	COMMENT	RESPONSE
0001762.17.16	<ul style="list-style-type: none"> Pg 128 ("Continue development and support for...") - Negative impact on lower-income workers who frequently do not have other options. 	<p>Comment noted. SCAG recognizes the potential equity impact of such a strategy particularly on lower-income workers. To address this, a holistic approach is necessary. This could involve offering subsidized or discounted parking rates for low-income individuals, enhancing public transportation access with subsidies, and encouraging flexible working arrangements like remote work or variable hours. Further measures like incentivizing carpooling and ridesharing, developing affordable housing near job centers, and actively involving the community in decision-making processes are also vital. Continuous monitoring and adaptation of these strategies based on their real-world impact will ensure they remain equitable and effective, thereby reducing the financial burden on lower-income workers while still fostering sustainable commuting practices.</p>
0001762.18.01	<p>District 7 Multi-Modal System Planning Comments on Draft Connect SoCal 2024 Chapter 3: The Plan</p> <ul style="list-style-type: none"> Pg 128 ("Continue to coordinate with regional partners...") - Nothing about support for Regional Rail (SCORE)? 	<p>Comment noted. The comment is in reference to strategies for Funding the System/User Pricing which would not be applicable to regional rail. However, Metrolink SCORE is already included in the Connect SoCal Project List. Additionally, other Connect SoCal strategies highlight support for transit/rail expansion. For example, the fourth strategy on p. 125 under Transit and Multimodal Integration is: "Expand the region's dedicated lanes network—including new bus rapid transit, dedicated bus lanes, express bus service on managed and express lanes—as well as the region's urban and passenger rail network and transit/rail signal priority treatments. Improve transit/rail frequency, reliability, and fare and scheduling integration across operators."</p>
0001762.18.02	<ul style="list-style-type: none"> Pg 130 ("Develop an agency-wide CBO Partnering...") - Provide oversight of non-profit and CBO contracts 	<p>SCAG did provide oversight of consultant contracts with community-based organizations through the Connect SoCal Community Partnership Program. See the Public Participation & Consultation Technical Report for more details.</p>
0001762.18.3	<ul style="list-style-type: none"> Pg 132 ("Facilitate development of EV charging...") - Add rapid charging to existing gas stations infrastructure? 	<p>Comment noted. While it's recognized that gas stations could present opportunities for the deployment of electric vehicle (EV) charging infrastructure, it's important to consider that the dynamics for gas stations and EV charging are quite different. EV charging typically takes longer than refueling a vehicle with gasoline.</p> <p>As a result, EV owners usually prefer to charge their vehicles during extended stays at locations for reasons other than just charging. Even with DC fast chargers, fully charging an EV can take between 30 to 45 minutes, which might not be convenient if there are no other activities to engage in during that time.</p> <p>Consequently, while gas stations offer potential sites for EV charging infrastructure, each location requires careful assessment to determine its suitability, and additional assessment should occur at a future date.</p>
0001762.18.4	<ul style="list-style-type: none"> Pg 132 ("Assist local jurisdictions in developing...") - Consumers can decide what makes sense for them through the market. 	<p>Comment noted. While it's understood that consumers have the autonomy to choose what best suits their needs through market mechanisms, the reality of higher upfront costs for Zero-Emission Vehicles (ZEVs) compared to Internal Combustion Engine (ICE) vehicles poses a significant barrier to adoption. This cost disparity is frequently identified as one of the primary barriers in the transition to cleaner vehicle technologies. In light of this, the development of local and regional incentive programs becomes critical. Such programs are essential to assist both fleet operators and individual consumers in making the shift to cleaner technologies. By offering financial incentives or subsidies, these programs can help mitigate the initial cost burden of ZEVs, making them a more viable option for a broader range of users.</p>
0001762.18.5	<ul style="list-style-type: none"> Pg 132 ("Support the development of clean transit...") - Is funding provided for additional cost 	<p>Comment noted. While the Innovative Clean Transit (ICT) regulation acts as a mandate for transit agencies in California to transition to zero-emission bus fleets, it is complemented by a variety of incentive programs that exist at both the state and federal levels. A detailed list of funding programs within California applicable to transit agencies can be found at Funding Finder: fundingfindertool.org. These are in addition to incentive programs offered by the federal government such as the Federal Transit Administration's Low or No Emission (Low-No) Grant program. No additional costs or funding has been proposed with respect to the ICT.</p>

ID	COMMENT	RESPONSE
0001762.19.1	District 7 Multi-Modal System Planning Comments on Draft Connect SoCal 2024 Chapter 4: Financial Summary <ul style="list-style-type: none"> Pg 141 ("SCAG further considers...") - A simpler way to address equity concerns is to not implement user fees and complicated redistribution schemes. 	Comment noted.
0001762.19.2	<ul style="list-style-type: none"> Pg 144 (Figure 4.3) - What happens to projections if we have a longer period of high inflation, similar to 1970's ? 	Comment noted. For the financial plan, we strive to forecast long-term financial consistency while closely monitoring the impact of recent changes. Although inflation rates (annualized to 2019) have varied considerably over time, they have generally trended between two and four percent (as shows in Figure 1 of the Transportation Finance Technical Report). We revisit these assumptions for every RTP/SCS update and would consider the impact to forecasts if there was a longer period of high inflation.
0001762.19.3	<ul style="list-style-type: none"> Pg 146 ("Excise taxes on gasoline...") - Tax hybrids and ZEVs at registration or "at the charger." 	SB 1 includes a registration fee for ZEVs, known as the Road Improvement Fee (RIF).
0001762.19.4	<ul style="list-style-type: none"> Pg 152 ("These sources include") - Seems incredibly optimistic. Several of these measures are extremely controversial. 	Comment noted. Table 4 of the Transportation Finance Technical Report includes availability assumptions and risk assessment for revenue sources in the Plan, including risk mitigation.
0001762.19.5	<ul style="list-style-type: none"> Pg 157 ("...implementation of road user charges...") - Highly speculative. Additional alternatives should have been identified. 	Table 4 of the Transportation Finance Technical Report includes availability assumptions and risk assessment for revenue sources in the Plan, including risk mitigation.
0001762.19.6	<ul style="list-style-type: none"> Pg 171 (Table 4.5.2) - Will there be public support tax increases and user fees to pay for transit when the mode share is so low? 	<p>Comment noted. Voters in the SCAG region have approved multiple sales taxes that fund transit investment. Five counties in the SCAG region currently have sales tax measures dedicated to local transportation expenditures. Imperial County Measure D imposes a 0.5 percent sales tax through March 31, 2050. Orange County Measure M imposes a 0.5 percent sales tax through March 31, 2041. Riverside County Measure A imposes a 0.5 percent sales tax through June 30, 2039. San Bernardino County Measure I imposes a 0.5 percent sales tax through March 31, 2040. Los Angeles County effectively imposes a permanent 2.0 percent sales tax (a combination of four 0.5 percent sales taxes—Proposition A, Proposition C, Measure R, and Measure M) as Measure M increases from 0.5 to 1 percent with the expiration of Measure R in 2039. Ventura County is currently the only county in the SCAG region without a local option sales tax measure.</p> <p>Spending on transit varies among measures, but the percentage of spending on transit is generally greater than the current mode share. For example, Orange County Measure M2 dedicates 25% of planned expenditures to transit capital, operations, and system preservation. Los Angeles County Measure M, approved by voters in 2016, dedicates 64% of expenditures to transit through the first 40 years of the measure.</p>
0001762.20	District 7 Multi-Modal System Planning Comments on Draft Connect SoCal 2024 Supplementals <ul style="list-style-type: none"> Pg 199 through 222 - Very useful section. 	Comment noted.
0001762.21.1	District 7 Freight Planning Comments on Draft Connect SoCal 2024 <ul style="list-style-type: none"> Page 10. Economy. Although it is noted that SCAG will "...[support] workforce development opportunities—particularly around the deployment of clean technologies..." would suggest adding reference to SCAG explicitly supporting and advocating for an equity-based approach to implementation of zero emission technology in all aspects of goods movement and the supply chain. 	Comment noted. The Goods Movement Technical Report states that impacted communities, particularly those near transportation corridors and distribution centers, often bear the disproportionate burden of poor air quality and its associated health risks. This disparity underscores the importance of addressing the equity implications of goods movement and ensuring that informed measures are taken to protect the health and well-being of vulnerable communities.
0001762.21.2	<ul style="list-style-type: none"> Pages 34,35. Clean Energy Transition. Suggest adding reference to the Warehouse Indirect Source Rule 2305. 	Comment noted. The 2024 Connect SoCal Goods Movement Technical Report provides more details on the state and regional regulations and rules.

ID	COMMENT	RESPONSE
0001762.21.3	<ul style="list-style-type: none"> Page 39. Map 2.1. Regarding the "Top 100 Bottlenecks," could clarification be provided as to whether they apply to HD trucks specifically, and/or identify which locations do apply to HD trucks in particular, and perhaps to MD trucks as well? 	Comment noted. Map 2.1 does not apply to HD trucks. The 2024 Connect SoCal Goods Movement Technical report provides specific details on the truck bottleneck analysis.
0001762.21.4	<ul style="list-style-type: none"> Page 60. Goods Movement. Recommend incorporating a reference to rail. 	Goods Movement section text is updated to state, "The region is also home to major border crossings with Mexico, air cargo facilities and an extensive roadway and rail network."
0001762.21.5	<ul style="list-style-type: none"> Page 61. Map 2.8. If possible, suggest adding a table that identifies the names of the airports, ports, ports of entry, and the names and general locations of the intermodal facilities and classification facilities, immediately following the map. 	Comment noted. The map is provided for general reference and the level of detail is beyond the intent of the report.
0001762.21.6	<ul style="list-style-type: none"> Page 63. Data collection, analysis and research. If the studies listed is limited to those completed in the last four years suggest that be mentioned. 	This text has been edited to reflect that these studies were completed since the adoption of the previous plan, Connect SoCal 2020.
0001762.21.7	<ul style="list-style-type: none"> Page 132. Clean Transportation (continued), first row, Other Responsible Parties. Suggest adding CTCs, federal and state agencies. 	The report is updated to reference CTCs on Page 132 and to clarify the list is not intended to be exhaustive.
0001762.21.8	<ul style="list-style-type: none"> Page 134. Economy. Strategy. Goods Movement, second row, Other Responsible Parties. Suggest adding CTCs, Caltrans, federal and state agencies, and partner agencies. Page 134. Economy. Strategy. Goods Movement, third row, Other Responsible Parties. Suggest adding Caltrans, federal and state agencies. Page 134. Economy. Strategy. Goods Movement, sixth row, Other Responsible Parties. Suggest adding CTCs, Caltrans. 	<p>Economy Goods Movement Other Responsible Parties is updated as follows:</p> <p>Second row, "Support: Mobile Source Air Pollution Reduction Review Committee (MSRC), CTCs, Caltrans, federal and state agencies, partner agencies, private sector companies, local jurisdictions"</p> <p>Third row, "Support: Caltrans, federal and state agencies, ports, Class I railroads, CTCs"</p> <p>Sixth row, "Support: U.S. DOT, Federal Railroad Administration, Maritime Administration, Caltrans, CTCs"</p>
0001762.21.9	<ul style="list-style-type: none"> Page 178. Less Time Spent Driving. Heavy Duty Truck Delay. Page 180 Table 5.1 Truck Delay by Facility Type. How were the identified percentage reductions in Heavy Duty Truck Delay on highways and arterials determined? How will they be achieved? 	Table 5.1 CONNECT SOCIAL PERFORMANCE PROFILE calculation and percentage changes are based on the SCAG travel demand model results on both freeways and arterials. The Less Time Spent Driving growth trend is calculated from the Baseline and Plan scenarios results.
0001762.22.1	<p>Comments on Aviation Airport Ground Access Technical Report</p> <ul style="list-style-type: none"> Page 16. Map 1. "March" is identified as "March Inland Port (MIP) in the Goods Movement Technical Report. For consistency, suggest the facility be referenced as March Inland Port on this map. NOTE: MIP was not included in Section 3.1. If MIP is operational and data is available, recommend including comparable information regarding MIP in this section. 	Comment noted. March Inland Port will be changed from "March" to "March Inland Port" on Map 1. March Inland Port was not included in section 3.1 of the Aviation and Airport Ground Access Technical Report because section 3.1 focuses on "Commercial Service Airports in the SCAG Region" (i.e., airports with scheduled passenger service). March Inland Port does not currently offer scheduled passenger service. March Inland Port is included in Table 3 "General Aviation and Reliever Airports in the SCAG Region" where it will be referred to as "March Inland Port" (Table 3, page 34).
0001762.22.2	<ul style="list-style-type: none"> Page 20. LAX Ground Access Improvements. Second paragraph. If any details regarding what improvements will be constructed in conjunction with the "LAX Cargo Modernization Program" can be provided, recommend including. 	Comment noted. As the LAX Cargo Modernization Program is still in its early stages, there was not as much specific and confirmed information that could be included in this section or the Aviation and Airport Ground Access Technical Report. However, information on the LAX Cargo Modernization Program will likely be included in future Connect SoCal, Aviation and Airport Ground Access Technical Report, updates.
0001762.22.3	<ul style="list-style-type: none"> Page 21. LAX Operational Breakdown. If available, suggest including information regarding truck traffic volumes (and type, LD, MD, HD) related to air cargo activity at LAX (in greater detail than the information provided in Table 5 on page 39 and Table 7 on page 67). 	Comment noted. Tables 5 and 7 are intended more for illustrative (and not comprehensive) purposes and are thus kept simple.
0001762.22.4	<ul style="list-style-type: none"> Page 26. Figure 2. San Bernadino International Airport and March Inland Port are not included. Are these two facilities not considered part of the "Transportation Hub Ecosystem" being illustrated? 	Comment noted. Figure 2 is a graphic produced by SoCal Gas for illustrative purposes and is not intended to be a comprehensive documentation of every individual piece of the "Transportation Hub Ecosystem" in the region.
0001762.22.5	<ul style="list-style-type: none"> Pages 51,62. Figure 21, Figure 23. Both figures appear to be presenting the same information. 	Comment noted. This is correct. They are the same table located in different sections for different purposes. Figure 21 on page 51 is intended to illustrate the impact of COVID-19 on cargo activity in the region. Figure 23 on page 62 is intended to illustrate the resiliency of the air cargo industry in the region.

ID	COMMENT	RESPONSE
0001762.22.6	<ul style="list-style-type: none"> Pages 71,72. Table 8, Table 9. Are any of the projects identified in Table 8 and Table 9 related to the "LAX Cargo Modernization Program?" If not, is it known if any project(s) related to the "LAX Cargo Modernization Program?" will be added to SCAG's RTP during the next four years? 	<p>Comment noted. The LAX projects listed in Tables 8 and 9 are not related to the LAX Cargo Modernization Project. Currently, the LAX projects included in the Project List Technical Report and highlighted in the Aviation and Airport Ground Access Technical Report are related to the Landside Access Modernization Program and the Airfield and Terminal Modernization Project. LAX Cargo Modernization Project roadway elements will likely be added to the Project List Technical Report if those planned roadway elements connect with public roads. Other LAX Cargo Modernization Program project elements that do not connect to public roadways might be highlighted in future "Non-Project List Airport Projects" tables.</p>
0001762.22.7	<ul style="list-style-type: none"> Page 74. Section 6.2.2. Is SCAG planning any analysis efforts specific truck traffic volumes—and most frequent travel patterns, specific to LD, MD, HD trucks, as pertains to air cargo activity at LAX, ONT, or any of the other airports in the SCAG region? 	<p>Comment noted. The SCAG modeling team converts the base year (2019) and horizon year (2050) cargo tonnage to estimated daily LD, MD, and HD truck trips for the commercial service and select reliever airports in the region. The estimated daily truck trips are then inputted into the regional model.</p>
0001762.23.01	<p>District 7 Freight Planning Comments on Goods Movement Technical Report</p> <ol style="list-style-type: none"> General. The sources identified for most figures and tables do not include dates. Could date information be added? General. It is noted that the footnotes are presented in a roman numeral format. Suggest changing to regular numeric. 	<p>All sources for figures and tables are updated to have dates included.</p> <p>Endnotes are updated to regular numeric format.</p>
0001762.23.02	<ol style="list-style-type: none"> Page 1. Recommend adding the year of the document referenced for the California Freight Mobility Plan, California State Rail Plan and for all of the SCAG study efforts (The Last Mile Freight Program, Zero Emission Truck Infrastructure Study, Goods Movement Communities Opportunities Assessment, Curb Space Management Study, Integrated Passenger and Freight Rail Forecast Study, Last Mile Freight Delivery Study, and Industrial Warehouse Study). 	<p>Introduction, the references to state and SCAG plans, projects and studies are updated to include document completion years, unless still ongoing which will be specified.</p>
0001762.23.03	<ol style="list-style-type: none"> Page 2. Key take aways--third bullet. 2 billion square feet, which county has most? Fifth bullet: Is the Barstow International Gateway already built? UP's Inland Empire Intermodal Terminal? 	<p>The single county with the largest industrial square feet is Los Angeles County. The Barstow International Gateway is anticipated to be operational by 2027/2028. UP's Inland Empire Intermodal Terminal is operational since 2021.</p>
0001762.23.04	<ol style="list-style-type: none"> Page 2. Last bullet. The last sentence appears to be incomplete. 	<p>Key Takeaways, the last sentence is updated to state, "The SCAG region continues to look to balance the need to work closely with communities, while also supporting workforce opportunities."</p>
0001762.23.05	<ol style="list-style-type: none"> Page 3. Figure 1. The "Marine" truck icon gives the impression of drayage trucks being smaller than class 8 HD trucks. Recommend making "Marine" trucks closer to the same size as "Domestic" trucks, keeping the colors different to distinguish between "Marine" and "Domestic." Is the "Near/Off-Dock Rail Yard" to be understood to represent rail-truck intermodal facilities (such as BNSF's Hobart Yard facility and UPRR's Intermodal Container Transfer Facility), which are shown on Map 1? Would not the "Outside of the Region Direct Rail (On-Dock) goods movement pattern include a rail-truck intermodal facility step? 	<p>Marine containers range from 20-foot, 40-foot, 45-foot, and 48-foot, with the majority 40-foot. Domestic containers and trailers are 53-foot while less-than-truckload trailers are 33-foot, typically using two connected trailers. These are sizeable differences equating to economies of scale justifying the graphics.</p> <p>Yes, there are numerous near- and off-dock rail facilities throughout the SCAG region.</p> <p>The report is updated to include the suggested rail-truck intermodal facility.</p>
0001762.23.06	<ol style="list-style-type: none"> Page 4. First paragraph. Including any quantitative context regarding rail's role in freight movement within and out of the region would be helpful. 	<p>Comment noted. An extensive discussion of freight rail is included in section 2.2.3 of the report.</p>
0001762.23.07	<ol style="list-style-type: none"> Page 6. Second paragraph. Suggest changing "By SCAG serving as..." to "As the SCAG area represents...." 	<p>Page 6 2.1 Importance of Goods Movement to the Economy and Consumer, second paragraph text is updated to state, "As the SCAG area represents the largest trade gateway..."</p>
0001762.23.08	<ol style="list-style-type: none"> Page 6. Figure 3. The one entry identified on the horizontal axis for 2022 does not appear to provide a direct correlation to 8.1 trillion annually. Suggest changing the vertical axis to be annual, in billions (or trillions). 	<p>Comment noted. Figure 3 is a line graph representing monthly data, while the \$8.1 trillion figure represents an annual total.</p>
0001762.23.09	<ol style="list-style-type: none"> Pages 7-9. Would it be possible to include any correlations of the nationwide information presented to the SCAG area? 	<p>Comment noted. This information will developed as part of the Comprehensive Sustainable Freight Plan Update and will be included in the next Connect SoCal update.</p>
0001762.23.10	<ol style="list-style-type: none"> Page 10. Figure 6. Is "...1/..." (included as part of the source information) a typo? 	<p>This is an error and the typo on Page 10. Figure 6 is corrected.</p>

ID	COMMENT	RESPONSE
0001762.23.11	12. Page 13. First paragraph. Suggest changing "...two ports..." to "...two seaports..." (if POLB has again supplanted NYNJ as second).	Section 2.2 last paragraph text is updated to state, "The SCAG region is home to the largest two seaports in the country..."
0001762.24.1	District 7 Freight Planning Comments on Goods Movement Technical Report 13. Page 15. Would it be possible to include any reason(s) as to why the SCAG region's growth rate and the State of California's growth rate has been notably less than the States with the highest growth?	Comment noted. This is not within the intent or scope of the report. To the extent that it may be relevant, the forces underlying economic growth rates may be considered as part of the forthcoming Comprehensive Sustainable Freight Plan update.
0001762.24.2	14. Pages 19,20. Bottom of page 19, top of page 20. As not all on-road transportation to and from the ports utilize I-710 suggest revising, "On-road transportation to and from the ports utilizes Interstate 710 (I-710),..." to "A substantial portion of on-road transportation to and from SPBPs utilizes Interstate 710 (I-710),...."	Page 19 2.2.2 Seaports, third paragraph is updated to state, "A substantial portion of on-road transportation to and from the ports..."
0001762.24.3	15. Page 25. Last paragraph. "Many Class I railroads across North America are testing multiple locomotive technologies to transition towards zero-emission capabilities." If there are specific examples located in California, suggest including at least some summary information.	Comment noted. More specific information is not readily available at this time.
0001762.24.4	16. Page 27. Section 2.2.4 First paragraph. Suggest adding all types of retail and wholesale operations to the list of facilities reached via critical last mile connections.	Comment noted. Connection to retail outlets is discussed in Section 2.2.4.
0001762.24.5	17. Page 29. Map 3. For clarity, as it is not expected this document will be updated after 2024 RTP/SCS is adopted, could the specific date(s) of the referenced recent submittals to FHWA be identified. NOTE: This comment also applies to Table 3 on page 30.	Comment noted. Official records are maintained by the FHWA Division Offices. Also, Caltrans provides a CUFC and CRFC Designation Map Viewer with further information.
0001762.24.6	18. Page 30. First paragraph. Suggest including an explanation as to why 2019 data is being used. NOTE: The sentence "More than 16,000 trucks per day travel on some sections these roadways." needs to be remedied.	2.2.4 Highway System last paragraph will include "More than 16,000 trucks per day travel on some sections of these roadways."
0001762.24.7	19. Pages 31,32. Figure 17. Figure 17 (or the related discussion that follows) does not include reference to two airports shown on Map 1, one which appears to be near the Port of Hueneme, and another which appears to be near I-215 and I-10 (San Bernardino International Airport?). Why were those airports not included? In the discussion provided subsequently, the March Inland Port (MIP) is referenced to have begun operations with Amazon only as of 2018, does MIP handle even less total cargo tonnage than Palm Springs, John Wayne, Burbank, or Long Beach? Has Southern California Logistics Airport started any air cargo operations yet, whether with Amazon or any other company? San Bernardino International Airport is noted to have moved nearly the same amount in international trade including 669,428 tons of cargo (in 2022?).	Figure 17 - SCAG staff was unable to gather air cargo tonnage information between 2000 and 2022 for the two airports mentioned. Those airports were left out of Figure 17 as their trend could not be measured across the same timeframe. Comparative data on air cargo tonnage for March Inland Port (MIP) is not publicly available, making direct comparison to other airports challenging at this time. The Southern California Logistics Airport is actively involved in air cargo operations. An airport map and list of tenants can be found on the airport webpage - https://www.victorvilleca.gov/home/showpublisheddocument/11640/638013561251630000 . As part of the Comprehensive Sustainable Freight Plan Update, further consolidation of air cargo data will be updated to inform the next Connect SoCal update.
0001762.25.1	District 7 Freight Planning Comments on Goods Movement Technical Report 20. Page 37. Second new paragraph. What is the source for "Goods movement, particularly heavy-duty trucks, contributes to 50 percent of NOX emissions and 18 percent of PM2.5 emissions in the region."? Is the region to be understood to be all six counties covered by SCAG?	Sources for "Goods movement, particularly heavy-duty trucks, contributes to 50 percent of NOX emissions and 18 percent of PM2.5 emissions in the region" include calculations using SCAG's activity-based model to estimate vehicle trips (including light/medium duty & heavy duty vehicles) in the six-county SCAG region, combined with the State's EMFAC model to calculate criteria pollutant emissions. See Connect SoCal 2024: Transportation Conformity Analysis Technical Report, Draft for more detail on the trip VMT and emissions calculation methodology. "The region" is the six-county SCAG region.
0001762.25.2	21. Pages 40,41. Bipartisan Infrastructure Law. Would it be possible to include known or typical timeframes for when the identified programs are available to apply for, and who is eligible to apply, or include a link to a USDOT website that provides such information?	Comment noted. It is not the purpose of the report to provide such level of detail on the federal programs. Such detailed information is provide by the appropriate federal agency.
0001762.25.3	22. Page 41. New Programs of Interest. The Consolidated Rail Infrastructure and Safety Improvements (CRISI) Program and the Port Infrastructure Development Program (PIDP) are listed under "New Programs of Interest," however these programs started prior to IJJA. RAISE was previously known as BUILD and before that it was known as TIGER.	New Programs of Interest CRISI, PIDP, and RAISE will be moved to the Continued Programs of Interest section.

ID	COMMENT	RESPONSE
0001762.25.4	23. Pages 41,42. Inflation Reduction Act. Would it be possible to include known or typical timeframes for when the identified programs are available to apply for, and who is eligible to apply, or include a link to a USDOT website that provides such information?	Comment noted. While this section of the report identifies the regulatory context for goods movement, it is not the intent to provide that level of program details. That information is available from the USDOT.
0001762.25.5	24. Pages 46,47. CTC-TCEP. The evaluation criteria for Transportation System Factors also includes "Zero-Emission Infrastructure." The evaluation criteria for Community Impacts is "Air Quality Impact, Community Engagement, and Economic Impact." The last five bullets do not appear to fully correlate with the "Other Factors, Including" content in Section 18 of the 2022 Trade Corridor Enhancement Program Guidelines.	CTC - Trade Corridor Enhancement Program, this section will be reviewed further against the adopted Program Guidelines to ensure all major criteria are included.
0001762.25.6	25. Pages 47,48. CTC – Senate Bill 671 Clean Freight Corridor Efficiency Assessment. Although not officially adopted until the CTC's meeting on December 6th and 7th, the circulation of the draft was announced at the CTC's October 18th-19th meeting. Recommend revising the content for this section to at least recognize that the assessment was adopted by the CTC at its meeting on December 6th and 7th, and to the extent feasible, cross-reference with the adopted version of the Assessment to ensure the content included in the discussion on this topic in the Goods Movement Technical Report is consistent with the adopted SB 671 Assessment.	Senate Bill 671 Clean Freight Corridor Efficiency Assessment: information will be reviewed against the final assessment report that was approved December 2023 to ensure all information is consistent.
Submitted by	Caltrans	Submittal 0001764
0001764.01.1	District 7 Freight Planning Comments on Goods Movement Technical Report 26. Page 48. Caltrans/CEC – Charging and Fueling Infrastructure Grant Program. The discussion provided does not make clear that while the funding opportunity is being pursued, an announcement has not yet occurred so it is unknown if it will be possible to implement what is summarized.	Section 3.1.2 - Charging and Fueling Infrastructure Grant Program information updated as the program announcements have been provided.
0001764.01.2	27. Page 48. GO-Biz – Critical Minerals in California. The discussion provided includes no information regarding equity considerations and/or environmental impacts.	Comment noted. The intent of this section is to identify coordination efforts with state agencies, not to assess challenges or opportunities with particular subject matter areas.
0001764.01.3	28. Pages 50,51. Table 4. The table does not include Rule 2305-The Warehouse Indirect Source Rule. Although it is noted that there is some discussion of this rule in Section 3.2 based on what is included in Table 4 it would seem logical to include Rule 2305.	Table 4 will be changed to add the Rule 2305 Warehouse Indirect Source Rule.
0001764.01.4	29. Page 52. Section 3.2 First paragraph. Would it be possible to include any current target dates associated with completing the indirect source rule efforts for commercial marine ports and rail yards and intermodal facilities?	Section 3.2 Regional and Local Policies, the information related to two rules commented on will be changed to include the most current information that has been provided from workshops to clarify schedule/targeted rule efforts.
0001764.01.5	30. Page 52. Section 3.2 Second paragraph. What is the date of the City of Los Angeles' "Green New Deal Plan?"	Section 3.2, Regional and Local Polices is updated to state the Green New Deal Plan was released by the City of Los Angeles in 2019.
0001764.01.6	31. Page 52. Clean Air Action Plan. According to a FAQ/Fact Sheet prepared by the Port of Long Beach the Clean Truck Fund (CTF) rate is \$10 per twenty-foot equivalent unit (TEU) for loaded containers, \$20 for containers longer than 20 feet. Beneficial Cargo Owners or their authorized agent are responsible for paying the CTF rate. Each port's tariff includes a provision prohibiting the CTF rate being paid by truck drivers. The CTF rate will end on January 1, 2035, but that may be subject to change. The focus of the funds collected the first year was to assist with purchasing zero emission HD trucks that service the two ports. In the second year the focus broadened to include supporting implementation of zero-emission refueling infrastructure for HD trucks that service the two ports. There are exemptions to the CTF rate that vary between the two ports.	Comment noted.
0001764.01.7	32. Page 53. The Los Angeles County Metropolitan Transportation Authority (LA Metro) I-710 Clean Truck Program. When did coordination with Metro regarding this information last occur?	SCAG has been in coordination with LA Metro regarding this over the past few years.
0001764.01.8	33. Pages 54,55. Last Mile Freight Program. If any other agencies besides SCAG and MSRC were involved, recommend identifying. Suggest including the performance metrics that will be used and the date(s) when results are anticipated.	Comment noted. As stated in the report, SCAG partnered with MSRC to establish the LMFP. It is not the intent of the report to provide discussion about program details.

ID	COMMENT	RESPONSE
0001764.02.1	<p>District 7 Freight Planning Comments on Goods Movement Technical Report</p> <p>34. Page 55. Zero Emission Truck Infrastructure Study. Suggest including the date(s) when results are anticipated.</p> <p>35. Page 56. Curb Space Management. Second Paragraph. Curb Management and Integrated Strategies to Catalyze Market Adoption of Electric Vehicles under the United States Department of Energy's (DOE) Vehicle Technologies Office Fiscal Year2021 Research Funding Opportunity. Suggest including the performance metrics that will be used and the date(s) when results are anticipated.</p> <p>36. Page 57. Supply Chain Analysis. It would be helpful if the dates of the "Comprehensive Regional Goods Movement Plan and Implementation Strategy (On the Move)" and the "Industrial Warehouse Study" could be identified.</p>	The report is updated to include anticipated dates for the Zero Emission Truck Infrastructure Study and Curb Management effort.
0001764.02.2	37. Page 60. Section 4.1. Recommend defining the difference between the SCAG area and Southern California.	The report is updated to clarify the difference between "SCAG region" and "all Southern California" in this section.
0001764.02.3	38. Page 62. Paragraph following Figure 24. Typo. "...not knit..." should be "...knit...."	This is an error and the typo is corrected.
0001764.02.4	39. Page 64. Figure 26. The purpose of the green diagonal line shown does not appear to be explained in the discussion.	The line corresponds to the right y-axis and is discussed in the report which states, "As of 2022, Asia Growth trade partners witnessed a 79 percent increase in trade value, while China declined by nearly 7 percent." The chart is revised to further clarify.
0001764.02.5	40. Page 66. Figure 28. What does LTM (beneath the last column on the right) mean?	The acronym LTM means "last twelve months." The report is updated to clarify.
0001764.02.6	41. Page 70. End of first paragraph. 1.4 billion or 1.4 trillion?	The report is revised to indicate 1.4 trillion.
0001764.02.7	42. Pages 70,71,74,75. Last-Mile Freight and Curb Space Management. The information provided is limited. If there are results from specific case studies, or any other particulars associated with known efforts to address this challenge, recommend including.	Comment noted. Case study information is provided and cited, including from SCAG's Last Mile Delivery Study.
0001764.02.8	43. Page 75. 4.4 Emerging Technologies and Advancements. "To combat climate change and improve air quality, the state has implemented several regulatory rules aimed at accelerating the adoption of ZEVs and NZEVs." It is understood that a number of Governor's Executive Orders and CARB regulations have focused on accelerating adoption of ZEVs. Which regulation(s) have aimed at accelerating the adoption of NZEVs? NOTE: The sentence "Given the heavy investment in zero-emissions technologies by the State and their potential for improving environmental and public health, these technologies, including battery electric and hydrogen options." does not appear to be a completed sentence.	CARB's Advanced Clean Cars II rulemaking allows for plug-in hybrid electric vehicles, which are NZEVs. The incomplete sentence is an error and is updated.
0001764.03.1.1	<p>District 7 Freight Planning Comments on Goods Movement Technical Report</p> <p>44. Page 75. Section 4.4 Second paragraph. Is "SCAG's goods movement system..." to be understood to mean the goods movement system within the SCAG area? Is the ensuing discussion applicable to all parts of the SCAG area to the same degree or is this discussion more applicable to some parts of the SCAG area than others? If it is more applicable to certain parts of the SCAG area, could these areas be identified?</p>	The direct correlation between freight demand and population growth, e-commerce shifts, and global trade impact all counties within the SCAG region, as well as all of Southern California. While not all counties are identical socioeconomically, there are still acute issues with respect to infrastructure and facilities within each county related to supply chains and the overall systems relationships supporting goods movement.
0001764.03.1.2	45. Page 76. Last paragraph. "Approval from the Biden administration would be required for the standards to move forward." Approval by an agency? US EPA? Recommend clarification.	Section 4.4.1, third paragraph last sentence is updated to "Approval from the US Environmental Protection Agency (EPA) would be required for the standards to move forward."
0001764.03.2	46. Page 77. 4.4.2 Air Cargo Facilities and Advanced Air Mobility. Is it known how much LAWA's June 2023 approved \$500,000 related to the LAX Electric Ground Support Equipment Incentive Program will reduce emissions?	The amount of emissions reduction expected from the LAX Electric Ground Support Equipment Incentive Program are not available at this time. The exact breakdown of how these funds are being allocated to specific projects or operators at LAX has not been outlined by LAWA - this breakdown is integral to emissions reduction estimates.

ID	COMMENT	RESPONSE
0001764.03.3	47. Pages 80,81. 4.4.6 Tube-Based Cargo Transportation. The discussion provided does not include any cost information and also does not appear to identify challenges/considerations associated with this technology, which was included in other emerging technology discussions. Additionally, if there have been any tube-based cargo transportation effort(s), perhaps a summary of those effort(s) should be included?	<p>Tube-based cargo transport remains under development currently. An estimate of cost is challenging to predict due to a range of factors involving infrastructural, technological, and regulatory challenges. Additionally, there are relatively few examples, with the technology still in its early stages. Per the commentor's suggestion to provide a summary of tube-based cargo transportation efforts, the report is updated to add the following paragraph regarding existing companies and projects to 4.4.6 Tube-Based Cargo Transportation before the final paragraph -</p> <p>"Several companies are developing and testing tube-based cargo transportation systems, primarily focusing on hyperloop technology. Led by firms like Hyperloop Transportation Technologies (HyperloopTT) and Zeleros, these companies are exploring the potential of hyperloop for improving goods movement efficiency and environmental sustainability. HyperloopTT in particular is working with the European Commission and the U.S. Department of Transportation to provide technical understanding of hyperloop systems. Among their projects is a multi-state commercial line project in the Great Lakes area and a testing & certification MOU with ENSCO at the Federal Rail Administration's Transportation Technology Center in Colorado. While still in the development phase, these efforts signify a significant step towards revolutionizing cargo transportation with high-speed, tube-based systems."</p>
0001764.03.4	48. Page 87. First paragraph. "There are numerous areas within Southern California including San Bernardino County and the Salton Sea..." might be interpreted to suggest that the Salton Sea is in San Bernardino County.	The report is updated to indicate that the Salton Sea is in Imperial County.
0001764.03.5	49. Page 89. Last paragraph. While the statement "Multiple state agencies including CARB, the CEC, CPUC, and CTC via SB 671 continue to assess and quantify wide-scale cost implications, grid capacity, and other impacts from the infrastructure side for zero emission targets." is correct it does not capture the broader range of public agencies, private sector companies, and non-profits also engaging to figure out these challenges.	The technical report is updated to indicate that the state agencies are leading efforts that will involve a broader range of stakeholders.
0001764.03.6	50. Page 90. Figure 36. If feasible, suggest numbering the facilities shown in Figure 36 and following the figure with a table identifying at least the names of each of the facilities.	Comment noted. Figure 36 is an image sourced from the California Air Resources Board and cannot be altered.
0001764.04.1	<p>District 7 Freight Planning Comments on Goods Movement Technical Report</p> <p>51. Page 91. 5.3 Highway and Roadway Congestion and Delay. "Truck traffic in the region is expected to grow at a very high rate, much higher than auto traffic, and will use an increasing share of the region's highway facilities." Is the very high growth rate of truck traffic across all areas within the SCAG region, or only in certain areas. If specific to certain areas, could this be identified? Will the truck traffic increase substantially for all classes of trucks (LD, MD, HD), or will there be variations amongst the classes of trucks? Does the expected high growth rate in truck traffic have any particular correlation to the implementation of zero emission technology? Does the expected high growth rate in truck traffic have any correlation to particular goods movement trends?</p>	<p>The statement indicates overall heavy truck traffic growth trends in the region and does not specify individual location-based truck traffic volume growth changes. The heavy-duty truck model includes heavy-heavy, medium-heavy, and light-heavy duty classifications, the variance is more associated with increases in local and air-cargo truck trips which is consistent with increasing localized consumption trends. The expected growth rate is inclusive of EMFAC assumptions for zero emission transitions, but there is no correlation of changing technologies leading to meaningful impacts on truck traffic volumes. Freight cycles are highly volatile, more so than overarching economic cycles and there is no correlation on goods movement trends, notably as the baseline is pre-pandemic 2019 and today's volumes across the region in many cases have reverted back below extreme peak levels. Further details regarding trends of growing truck volume by weight and axle classification, new technologies, and freight trends will be a major focal point in the forthcoming Comprehensive Sustainable Freight Plan Update.</p>
0001764.04.2	52. Pages 92,93. Map 4. Recommend specifically identifying the name of the 2050 Plan and the 2050 Baseline in the Map title and in the legend. NOTE: Recommend including an explanation of the difference between 2050 Plan and 2050 Baseline in the discussion provided following Map 4.	The report is updated to provide the definition of Baseline and Plan.
0001764.04.3	53. Pages 94-99. Maps 5, 6, 7, 8, 9, 10. SR-58, US-395, part of SR-126, SR-86 and SR-111 do not appear to be included. Why not? There are notable truck volumes on all of these routes.	7ca a YbhbcfX"5hikJgha YZkY bYwGgJfmbZcfa Uhc b JgbchUj UjUWYtc i dXUHYkYfYei JfYX segments.
0001764.04.4	54. Page 100. 5.4 Freight Corridor Bottleneck Analysis. If the 2019 Caltrans AADTT data was used (instead of another year) due to the impacts the pandemic had on traffic volumes it is recommended that this be explained.	5.4 Freight Corridor Bottleneck Analysis, Page 100, first paragraph is updated to state, "The baseline INRIX and Caltrans 2019 truck volume data was used to avoid any bias impacts of COVID-19 Pandemic."
0001764.04.5	55. Page 101. Content limited to a single incomplete sentence.	This is an error and the sentence is updated.

ID	COMMENT	RESPONSE
0001764.04.6	56. Pages 102,103. Table 8. What is the basis of the order of bottlenecks listed in this table? If there is no specific basis for the order, would it be possible to list either by order of route--smallest highway number to highest, or by county (alphabetically) and the routes for each county listed in order (smallest highway number to highest)?	Table 8, Pages 102 and 103, is updated to list bottlenecks by route number in ascending order.
0001764.04.7	57. Pages 104,105. Map 11, Table 9. In Table 9 Is US-1 meant to be SR-1. Additionally, Map 11 does not appear to show a SR-1 shield anywhere. Routes SR-86, SR-74, US-395, and SR-18 are all identified as having (at least in some portions) HDT annual vehicle hours of delays over 20,000 but there are no portions of those routes as shown on Map 11 that are marked in either yellow or red. NOTE: Would it be possible to identify the post mile segment(s) associated with the annual vehicle hours of delays shown?	Map 11 and Table 9, Pages 104 and 105, Table 9 is updated with "US-1" being changed to "SR-1". Map 11 is updated to show SR-1 shield appropriately. At this time routes SR-86, SR-74, US-395, and SR-18 delay related portions are not able to be updated on Map 11. At this stage, it will not be possible to include the post mile segments associated with the annual vehicle hours of delays shown in Map 11 in the report.
0001764.05.1	District 7 Freight Planning Comments on Goods Movement Technical Report 58. Pages 105,106. Last bullet. The information provided in Table 9 is understood to be a presentation of annual vehicle hours of delays associated with particular (portions?) of the routes listed. The table does not appear to include specific interchange locations such as SR-57/SR-60. Where is the "...112,450 AVHD in 2019 accounting for 3 percent of total regional HDT delay..." shown in Table 9? NOTE: Same question regarding the reference to Table 9 made in the third bullet on page 106.	Table 9 includes the total delay for the entire freeway corridor and the 3% represents the total regional delay for the SR60/SR57 interchange alone and not for the overall corridors (SR-60 and SR-57).
0001764.05.2	59. Page 106. Last three bulleted items on page 106. The third from last and second from last bullet each reference a "...fifth most congested bottleneck..." location. The I-215/University Avenue location's 73,400 AVHD appears to be substantially more than the I-5/I-605's 60,200 AVHD. Does the text in the last bullet include both of the "...fifth most..." locations?	The fifth most congested bottleneck for the 2024 Connect SoCal is the I-215 NB at University Avenue in Riverside as is stated in bullet #6 on page 106 of the Goods Movement Technical Report. The other "fifth" bottleneck in bullet #4 on page 106 of the report is referencing the 2020 Connect SoCal RTP/SCS and is used to illustrate that the I-5 NB at SR-2/Glendale Blvd bottleneck has moved from fifth to being the third most congested HDT bottleneck location in the region.
0001764.05.3	60. Page 106. First paragraph. "Error! Reference source not found.."	This is an error and the text "Error! Reference source not found." is removed from the report.
0001764.05.4	61. Page 106. 5.5 Truck Parking. Though not explicitly stated, is all discussion in this regard focused specifically on HD trucks?	Truck Parking data includes heavy duty truck parking locations and does not include light and medium duty truck parking locations.
0001764.05.5	62. Page 107. First new paragraph. Please identify the date of the referenced "...California's most recent Jason's Law survey are shown in Table 10." in the narrative discussion.	Comment noted. The source information below the table is updated to state, "SCAG accessed Federal Highway Administration web page on July 2023."
0001764.05.6	63. Pages 107,108. Last paragraph page 107, first paragraph page 108. The discussion appears to be indicating that there is a decreasing supply of public truck parking due to location closures or diminished capacity. How was this determined? Over what timeframe?	In the summary report (Jason's Law Truck Parking Survey Results and Comparative Analysis), Federal Highway Administration (FHWA) describes the truck parking data collected from States and stakeholders as consistent in the identification of truck parking challenges and regions of supply shortages. The majority of States identify a truck parking problem and the general locations of shortages, such as unofficial or illegal parking along shoulders, ramps, on local streets, and in commercial areas. Their determination is based on the truck traffic estimation and its correlated truck parking demands on major freight corridors across the country.
0001764.05.7	64. Page 109. Map 12. Could a different color be used for private and public facilities? If feasible, suggest numbering the facilities shown in Map 12 and following the map with a table identifying at least the names of each of the facilities, and indicating whether public or private.	Comment noted. At this stage it is only feasible to update the map. Map 12 will be revised to depict the private and public facilities using different colors.

ID	COMMENT	RESPONSE
0001764.05.8	65. Pages 110,111. Will it be possible for SCAG member agencies to receive any more detailed information generated from the truck parking analysis, specific to certain geographic locations? This information could help with analysis efforts focused on where it might be possible to establish additional parking for HD trucks. Additionally, recommend identifying the truck classes/weights associated with MD and HD truck parking information shown on Map 13. NOTE: "Map 13" is inserted following the end of the second paragraph.	<p>Yes, SCAG will be leveraging work from 2024 Connect SoCal parking analysis into the forthcoming Comprehensive Sustainable Freight Plan Update with the goal of enhancing regional tools for broader collaboration across the region.</p> <p>Regarding the truck classes/weights, Map 13 focuses on the duration of the MD/HD truck parking location so differentiating colors by truck class might be confusing to demonstrate each purpose. Further analysis regarding truck parking location maps will be included in the Comprehensive Sustainable Freight Plan update and next Connect SoCal update.</p> <p>Lastly, the text "Map 13" is an error and is deleted from the end of the second paragraph on page 110.</p>
0001764.06.01	District 7 Freight Planning Comments on Goods Movement Technical Report 66. Page 114. Figure 37. As the costs of new vehicles will likely continue to fluctuate it is recommended that the year of the source information for this figure be included as part of the source information.	The source for Figure 37 is updated to "SCAG Clean Technology Compendium; CARB, Advanced Clean Fleets Regulation: Appendix G. Total Cost of Ownership Discussion Document, 2022"
0001764.06.02	67. Pages 116-121. Maps 14-19. The source information for the maps indicates 2022 but the summary information provided on page 115 referenced 2019, is the collision density information shown approximately the same as summarized for 2019 or is it different? Is the collision density information shown limited to the state highway system? Is it for HD trucks only or does it include MD or MD and LD trucks as well? Is there information about the causes of the collisions shown?	The collision data in Section 5.7 is updated from 2019 to 2022 data. The collision information includes all collisions recorded by SWITRS including highways and arterials. SWITRS defines truck as vehicle "with two or more axles, or truck tractor, operated singly or with one or more trailers or semi-trailers (excludes pickups, panel trucks, or vans)." Information on primary cause of collision is available in the SWITRS dataset also accessible on TIMS website.
0001764.06.03	68. Page 123. Last paragraph. The first sentence appears to indicate that the pandemic began in 2019. In terms of economic impacts were there any economic impacts in the US before the first quarter of 2020?	The first sentence is updated to clarify the timing before and during the pandemic. There was a freight recession during 2019 that impacted economic indicators.
0001764.06.04	69. Pages 132,134. Map 20, Map 21. Are these maps showing the location of new projects (whether passenger rail or freight rail)? If so, suggest identifying the new projects more clearly. NOTE: Although there is some discussion on page 154 which references these two maps, some explanation of the content on these maps on pages 131 or 133 would be helpful.	A new endnote has been added to Section 7.1 Policy 1 - Rail Investment to provide a source/link to the study with further details and information.
0001764.06.05	70. Page 136. Figure 40. What is meant by "Freight Passive (1)" and "Freight Passive (2)?" There does not appear to be any discussion explaining Figure 40.	Figure 40 is used as a reference image to the Southern California Goods Movement Communities Opportunities Assessment Study. An end note is provided in the preceding paragraph that links to the study report for further information. By applying GIS-based clustering analysis, the study yielded six distinct types of goods movement communities across the SCAG region. Freight Passive (1) and Freight Passive (2) represent communities located outside the urban core and situated at the periphery of major freight activity hubs. These community types experience relatively low impacts from freight activities.
0001764.06.06	71. Page 136. First paragraph. "Long Beach – East Los Angeles Corridor Plan" should be "Long Beach – East Los Angeles Corridor Investment Plan."	The text "Long Beach – East Los Angeles Corridor Plan" on Page 136 is updated to "Long Beach – East Los Angeles Corridor Investment Plan."
0001764.06.07	72. Page 138. First bullet. Caltrans would appreciate being able to have multiple personnel be members of the Southern California Technical Advisory Committee for the Comprehensive Goods Movement Plan update.	SCAG will ensure that Caltrans is included within this upcoming major study effort.
0001764.06.08	73. Page 140. Second bullet. Recommend identifying Port of Long Beach with this project.	Seaport Strategies (7.5.1) the second bullet is updated to state, "Port of Long Beach, the Middle Harbor Redevelopment Project, doubling the capacity of the two terminals replaced, and including electric-powered cargo-handling equipment."
0001764.06.09	74. Pages 141-144. Table 11. Recommend clearly indicating, either in the "Project Title" field or in the "Project Description" field, which port is sponsoring/implementing the project.	The report is updated to indicate the Port that is sponsoring/implementing the project.
0001764.06.10	75. Page 145. Second paragraph. 3 percent?	The report is updated to indicate 3 percent.
0001764.06.11	76. Page 146. Recommend identifying which agency is associated with the first three bulleted projects.	The technical report is updated to identify the lead agencies.

ID	COMMENT	RESPONSE
0001764.06.12	77. Page 147. Map 22. Suggest including a reference to Table 15, before or after this map, to let readers know where project name and location information is for "E.1-LA," "F.4-LA," "F.1-LB" etc.	The technical report is updated to add a reference to Table 15.
0001764.07.1	District 7 Freight Planning Comments on Goods Movement Technical Report 78. Page 148. Recommend identifying the implementing agency for all of the bulleted projects (in the first and last sets of bullets) where this information is not already provided.	Further clarification is provided where feasible for the first set of bullets. The last set of bullets is in regards to completed projects and information on implementing agency is not necessary for the purpose of this report.
0001764.07.2	79. Pages 149-151. Table 12. Recommend clearly indicating, either in the "Project Title" field or in the "Project Description" field, which agency is sponsoring/implementing the project.	Comment noted. That level of information is not intended for the purposes of this report. Further details on the projects which have received awards from state and federal programs can be found at the web pages of the respective state and federal programs listed in the table.
0001764.07.3	80. Page 154. Bulleted items. Are the various improvements listed under "Short-Term Main Line Improvements," "SCORE Program," and "Additional Freight and Rail Enhancements" as bullets all included in the 2024 RTP project list? If so, recommend adding some summary information in this regard including clarification if any of the bulleted items represent bundles of specific projects, whether in the RTP or otherwise.	Yes, the report is modified to provide further clarification on this point.
0001764.07.4	81. Page 155. Suggest indicating if all of the bulleted projects identified on page 155 are in the 2024 RTP project list, or if all are not, indicating which projects are.	The technical report is modified to indicate project status for the bulleted projects.
0001764.07.5	82. Page 156. Map 23. Are the "Planned" and "Under Construction" identified grade separation project locations shown in the map all included in Table 15? If so, recommend including a reference to Table 15 before or after the map. If not recommend including a table following this map identifying the project name and location information.	Map 23 - Yes, "Planned" and "Under Construction" grade separation project locations are included in Table 15. The description of table 4.3 second paragraph is updated to state, "Please refer to Table 15 for further information." as an added new sentence.
0001764.07.6	83. Pages 161,162. Last bullet on page 161. Intermodal (IMX) Truck Trips, defined as "domestic intermodal truck trips that have origins or destinations at regional intermodal facilities in the SCAG region," are stipulated to "not include those that have either an origin or destination at the San Pedro Bay Ports as they were modeled by Port HDT Model." Does SCAG's HDT model not utilize or incorporate the Port HDT model? If not, suggest including information explaining how truck trips covered by the port HDT model are accounted for in the SCAG region.	Comment noted. SCAG's modeling process incorporates the Ports of Los Angeles and Long Beach model that includes non-rail truck estimates. This integration is included within the Port Truck Trips and Secondary Port Truck Trips categories.
0001764.07.7	84. Page 162. First new paragraph. "Error! Reference source not found.."	This is an error and the text "Error! Reference source not found." is removed from the report.
0001764.07.8	85. Page 162. Table 14. Is there information comparable to what is provided in Table 14 for the SPBPs, for the Port of Hueneme?	The information in Table 14 reflects integrated port information through the Port and Secondary categories and includes Port Hueneme within Ventura County. Please refer to the definitions of these categories for SCAG's HDT model.
0001764.07.9	86. Pages 163,164. Bulleted list of "Short-Term Improvements," "Mid-Term Improvements," and "Long-Term Improvements." If the projects are not listed in any particular order, it is recommended that this be explained.	7.5.3 Highway Strategies is updated to state, "Below are select higher magnitude cost projects for short-term, mid-term, and long-term highway improvements."
0001764.08.1	District 7 Freight Planning Comments on Goods Movement Technical Report 87. Page 164. Long-Term Improvements. Regarding the related discussion that follows on pages 166 through 168, if possible, recommend providing clarification as to what these improvements are currently anticipated to include if these scopes of work are anticipated to only be on the state highway system or if they are anticipated to include local roads as well. If local roads are anticipated to also be involved, suggest confirming if the improvements would be limited to identified truck routes, and also if the truck types would be HD only or MD and LD as well. NOTE: If possible, suggest including in the discussion that follows how these improvements align with State policies, such as CAPTI.	The goods movement project list and implementation strategies include both corridor and roadway access improvements to freight facilities including truck and rail freight modes through the Plan horizon. At this time as these long-term improvements are anticipated beyond 2035, the Comprehensive Sustainable Freight Plan Update immediately following 2024 Connect SoCal will look to address many of the comments raised further with respect to project scope development.
0001764.08.2	88. Page 165. Map 24. Suggest including a reference to Table 15, before or after this map, to let readers know where project name and location information is for "A.1," "A.2," "A.3" etc.	Reference to Table 15 is added.

ID	COMMENT	RESPONSE
0001764.08.3	89. Page 166. Long Beach-East Los Angeles (LB-ELA) Corridor Mobility Investment Plan. Recommend using the full formal name of the effort rather than "LB-ELA Corridor Plan" in the discussion provided under this section and putting "LB-ELA Corridor Plan" in parenthesis if it is intended to use "LB-ELA Corridor Plan" as a shortened reference. NOTE1: The Long Beach-East Los Angeles (LB-ELA) Corridor Mobility Investment Plan Task Force set up working groups (Community Engagement Strategy, Equity Working Group, and Zero-Emissions Truck Working Group) and the Community Leadership Council rather than committees. NOTE 2: The LA Metro Board approved adoption of the No Build Alternative as the locally preferred alternative at their May 2022 Board meeting. NOTE3: "...save..." should be "...safe...."	The technical report is revised to use the full formal name of the effort, reference the working groups, and replace "save" with "safe."
0001764.08.4	90. Pages 166,167. East-West Freight Corridor. Caltrans would encourage and support more direct engagement with stakeholders in the course of revisiting the EWFC concept during the course of SCAG's Comprehensive Goods Movement Plan Update, perhaps including utilization of a Technical Advisory Committee.	Comment noted.
0001764.08.5	91. Page 167. Zero Emission Vehicles and Infrastructure. Recommend identifying the timeframe the \$5 billion in investments is needed, and how much has been secured to-date.	The draft Project List identifies a timeframe through 2050 for the \$5 billion. SCAG will leverage its work through the Zero Emission Truck Infrastructure Study to expand upon zero emission vehicles and infrastructure investment planning, including throughout the upcoming Comprehensive Sustainable Freight Plan Update.
0001764.08.6	92. Page 167. ITS Strategy. If possible, recommend providing more information about the DRAYFLEX program, such as extent of usage, performance to-date and any known future plans.	Comment noted. DrayFLEX is one of many strategies listed in the report and it is not the intent of this section to provide the level of detail described. More specifications about the program can be obtained from LA Metro.
0001764.08.7	93. Page 169. Suggest adding reference to the Port of Hueneme in the second paragraph.	Reference to Port of Hueneme is added.
0001764.09	District 7 Freight Planning Comments on Goods Movement Technical Report 94. Pages 170-190. Table 15. If possible, suggest adding a column to this table to include the 2024 RTP project ID, for all of the projects that are included in the 2024 RTP project list. 95. Pages 191,192. Table 16. If possible, suggest adding a column to this table to include the 2024 RTP project ID, for all of the projects that are included in the 2024 RTP project list.	Project ID columns are updated to Tables 15 and 16.
0001764.10.1	District 7 Special Projects Office (Transportation Planning) Comments on Draft Connect SoCal 2024 Overall, the thrust of the Connect SoCal 2024 RTP aligns with Caltrans' foundational principles of equity, climate action, safety, and economic prosperity. It is generally heading in a prudent direction. Comments below reflect areas of possible improvement to a good document. • P 6. Recommend changing "mobility" to "access." Mobility is what we have tried to do by encouraging long distance travel with autos. It has cost us in reduced access to the destinations we need to reach – work, school, retail, recreation, medical, etc. We can travel for 2 hours to reach far away locations, but we will be better off if we can access places we need in short distances. • P 12. Same comment	Comment noted. Connect SoCal supports improving both mobility and accessibility across the region. As noted within the plan, Connect SoCal envisions a future where transportation is efficient, multimodal and accessible to all. Integrated transit networks will provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas. Innovative technologies will play a vital role in expanding accessibility and reducing congestion and emissions.

ID	COMMENT	RESPONSE
0001764.10.2	<ul style="list-style-type: none"> • P. 22. Reducing congestion should not be a goal. Attempting to “solve congestion” usually means widening or expending highways. This just induces more auto travel. Even encouraging people to use transit, bike, and walk doesn’t solve congestion. For every person we attract to these modes, it just provides another space for someone else to drive. It’s called the “law of triple convergence.” This observes that when roads get congested people will opt to: <ul style="list-style-type: none"> - Leave at another time that is less congested - Take different routes - Switch to other transportation modes <p>When we try to alleviate congestion with road widening, enhanced transit, better bicycle or walking facilities, people opt to return to:</p> <ul style="list-style-type: none"> - Leaving at their preferred time - Taking their original route - Solo driving <p>Thus, getting us back to the same congestion. The only strategy that works to reduce congestion is pricing. Again, access is what we are after. Not to say that we shouldn’t enhance transit, add bikeways, or improve pedestrian facilities. We should improve these options to give people more choices. But we shouldn’t expect growth in these modes to reduce congestion.</p>	<p>Comment noted. Both Caltrans and SCAG are required to address congestion as part of the federal regulations for Statewide and Metropolitan Transportation Planning and Programming, including implementing the congestion management process in transportation management areas. Connect SoCal includes Funding the System/User Fees policies and strategies (including congestion-based pricing programs) on pages 116 and 128 of the main book.</p>
0001764.10.3	<ul style="list-style-type: none"> • P. 23 Same comment on Mobility as above. • P. 38 Same comment on Mobility as above. 	<p>Comment noted. Connect SoCal supports improving both mobility and accessibility across the region. As noted within the plan, Connect SoCal envisions a future where transportation is efficient, multimodal and accessible to all. Integrated transit networks will provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas. Innovative technologies will play a vital role in expanding accessibility and reducing congestion and emissions.</p>
0001764.10.4	<ul style="list-style-type: none"> • P. 81 Do the population trends in Table 3.1 reflect recent drops in population? It is difficult to predict, but presently we are losing population. 	<p>The projection process was undertaken with an understanding that the region was currently in a period of population decrease. However, this is not expected to continue in the long run due to the expectation of job growth, partial restoration of immigration levels, reduction in excess deaths due to COVID-19, and a major reversal in the domestic out-migration trend—all of which have been observed by mid-2023.</p>
0001764.11.1	<p>District 7 Special Projects Office (Transportation Planning) Comments on Draft Connect SoCal 2024</p> <ul style="list-style-type: none"> • P. 92 Under “Regional Express Lanes Network”. We should be aware that the way we converted HOV lanes to HOT lanes on the I-10 and I-110 freeways led to a consistent drop in HOVs. The devil is in the details and if we are going to add express lanes, we must manage them to favor high-occupancy modes. For example, directing a higher ratio of the revenue to bus-on-freeway transit. Further, the focus has been on pricing lanes that HOVs use. We should consider pricing the SOV lanes and providing financial incentives to HOVs. 	<p>Comment noted. It is also important to consider degradation in HOV lanes, for which conversion to express lanes has been a solution. Note that Metro J Line (Silver) operates on the express lanes along I-10 and I-110.</p>
0001764.11.2	<ul style="list-style-type: none"> • P. 94 The map doesn’t show a network of regional bus transit system on our freeway network. This should be a central feature of this plan. 	<p>Comment noted. The network also includes the transit system on the freeway network. Zooming in on the map provides more clarity.</p>
0001764.11.3	<ul style="list-style-type: none"> • P. 114 Same comment on Mobility as above. 	<p>Comment noted. Connect SoCal supports improving both mobility and accessibility across the region. As noted within the plan, Connect SoCal envisions a future where transportation is efficient, multimodal and accessible to all. Integrated transit networks will provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas. Innovative technologies will play a vital role in expanding accessibility and reducing congestion and emissions.</p> <p>Connect SoCal's Mobility Technical Report describes in more detail the plan's short trips strategies. SCAG knows that a significant portion of trips that people make in the region are short. The implementation of short trip strategies (e.g., first/last mile projects, bike and pedestrian infrastructure, Safe Routes projects, etc.) can effectively reduce vehicle miles traveled (VMT), encourage mode shift, and support the use of transit/rail.</p>

ID	COMMENT	RESPONSE
0001764.11.4	<ul style="list-style-type: none"> P. 114 This section should mention a regional bus transit system on our freeway network. 	<p>Comment noted. Complete Streets Policy #3 and Transit and Multimodal Integration Policy #7 are intended to broadly cover multimodal initiatives including transit on the freeway network. The following Transit/Rail Strategy also supports these efforts: "Expand the region's dedicated lanes network—including new bus rapid transit, dedicated bus lanes, express bus service on managed and express lanes—as well as the region's urban and passenger rail network and transit/rail signal priority treatments. Improve transit/rail frequency, reliability, and fare and scheduling integration across operators."</p>
0001764.11.5	<ul style="list-style-type: none"> P. 180 Same comment about Mobility as above. The goal isn't to maximize the distance people can travel. It is to ensure that people can conveniently reach the destinations they need to. 	<p>Comment noted. Connect SoCal supports improving both mobility and accessibility across the region. As noted within the plan, Connect SoCal envisions a future where transportation is efficient, multimodal and accessible to all. Integrated transit networks will provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas. Innovative technologies will play a vital role in expanding accessibility and reducing congestion and emissions.</p>
0001764.12	<p>District 7 Division of Program and Project Management PPM Financial Programming staff completed a thorough review of the SCAG report, including the Draft RTP Document, associated Technical Reports (including the Project List), and the 2023 Federal TIP Consistency Amendment# 23-26. Regarding Caltrans projects, the information is confirmed to align with our records and is up to date.</p>	<p>Comment noted. Thank you for your review and confirmation.</p>
0001764.13.1	<p>Caltrans District 8 District 8 Office of System Planning Comments on Connect SoCal 2024 1. Page 82, Chapter 3 "The Plan". "affirmative" is a charged word, seek alternatives.</p>	<p>Comment noted. SCAG usage of the term affirmative is from the State of California's goals to affirmatively further fair housing.</p>
0001764.13.2	<p>2. Page 91, Chapter 3 "The Plan". Maybe put the definition of Universal Basic Mobility in parenthesis. UBM isn't defined until page 38.</p>	<p>Comment noted. Universal Basic Mobility is also defined in the glossary section included in Plan supplemental materials.</p>
0001764.13.3	<p>3. Page 97, Chapter 3 "The Plan". "below 2005 levels".... Perhaps put in the precise level? The sentence is too vague.</p>	<p>Comment noted. SB 375 targets are expressed as a percentage change from 2005 levels, specific to per capita passenger vehicle greenhouse gas emissions.</p>
0001764.13.4	<p>4. Page 99, Chapter 3 "The Plan". Map on page 98 should not run to the top page, not aesthetically pleasing to the eye. Put in a margin. Also add in units next to numbers (ex. Greater than 500 households).</p>	<p>Comment noted. Units added to the legend text.</p>
0001764.13.5	<p>5. Page 100, Chapter 3 "The Plan". "redevelop".... Can do without the quotation marks. 6. Page 101, Chapter 3 "The Plan"."a" versus "an".... SOI into the city limits.... The article needs to be changed.</p>	<p>Comment noted. Changes include: removing quotations from "redevelop" and changing "an SOI" to "a SOI"</p>
0001764.14.1	<p>District 8 Office of System Planning Comments on Connect SoCal 2024 <ul style="list-style-type: none"> Thank you for the opportunity to review Connect SoCal 2024. Overall, the document was well written and demonstrates SCAG's continual commitment to leading long-range planning in the Southern California Region. The quality of the document, its appearance and maps that were provided continues to be of high quality. This type of quality document is consistent with what SCAG has consistently produced for many years. </p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001764.14.2	<ul style="list-style-type: none"> To produce the finest quality final public policy document, we believe it should be noted that the previous RTP/SCS, Connect SoCal 2020, anticipated we would have roughly another 3.5 million people in the Southern California region by the year 2045. Why this was true then wasn't entirely clear because Connect SoCal 2020 noted that the region had lost 91,000 residents per year from 2014 to 2018 due to demographics and housing affordability issues. Since this discussion was in a section titled "Progress", we wondered if the region had really progressed or was an abandonment trend that needed to be reversed beginning to occur? 	<p>Connect SoCal 2020 noted that, as has now been the case for 31 of the past 33 years, the number of Southern Californians leaving for other regions and states exceeds the number entering from other regions and states; nonetheless, population continued to increase between 2014 to 2018 due to immigration and natural increase. Section 3.1 of the current plan's technical report describes how negative net domestic migration is a longstanding feature of Southern California's demographics and that a substantial portion of the recent population decline can instead be attributed to three principal factors related to COVID-19.</p> <p>A further important consideration is the availability of Census 2020 data which provided a much updated—and lower—baseline from which to conduct Connect SoCal 2024 projections. The California Department of Finance's demographic projections for the region and state have also been revised downward following the release of this data.</p> <p>The forecast's theme of "Slower Growth, Steady Improvement" is intended to capture this revised demographic outlook in the context of regional planning by emphasizing the continued need for housing and supportive infrastructure despite a much lower population growth outlook than in prior plans.</p> <p>In contrast to other forecasts, SCAG jointly projects long-run employment, housing, and population growth. The baseline assumptions used (see Table 8) reflect lower base year population but also consider the region's relative economic strength compared to the nation (e.g. robust post-COVID job growth and economic outlook) as well as recent increases in housing production including the highest levels of new permitting since prior to the Great Recession, which are supported by state policies and investments.</p>
0001764.14.3	<ul style="list-style-type: none"> Connect SoCal 2024 anticipates that the region will grow by a much more modest 2 million people by 2050. Connect SoCal 2024 also notes (Page 8) that the region continued to lose population from 2019 to 2023. Between 2014-2023 the region has now experienced a ten-year population decline. So why this would reverse from 2024-2050 and the region would instead grow by almost 77,000 people per year from 2024 to 2050 (2 million new people/divided by 26 years) wasn't made clear enough in the current draft of Connect SoCal 2024. 	<p>A ten-year population decline between 2014-2023 is not supported by Department of Finance population estimates, which show that absolute population declines only began over 2019-2020.</p> <p>As described in section 3.1 of the technical report, a substantial portion of the recent population decline can be attributed to three principal factors related to COVID-19. In contrast to other forecasts, SCAG jointly projects long-run employment, housing, and population growth. The baseline assumptions used (see Table 8) reflect lower base year population but also consider the region's relative economic strength compared to the nation (e.g. robust post-COVID job growth and economic outlook) as well as recent increases in housing production including the highest levels of new permitting since prior to the Great Recession which are supported by state policies and investments.</p>
0001764.14.4	<ul style="list-style-type: none"> Connect SoCal 2024 repeatedly notes demographics, and the shortage of affordable housing are still the likely cause of people leaving the region. But that neither SCAG or the RTP/SCS Plan itself has any ability to address this problem. Connect SoCal 2024 notes that SCAG has no land use or zoning authority to create regulations that will produce more housing. It's also not apparent why the increasingly older trending population demographics that are expected in Southern California would support the development of more housing or the need for multi-billions in transportation improvements that are planned. 	<p>The Demographics and Growth Forecast Technical Report (Section 3.2) describes that housing demand will increase because of the high household formation rates of the (increasingly) aging population. Seniors are increasingly likely to age-in-place yielding far smaller household sizes (e.g. a couple, or a single surviving spouse), leading to a need for housing for the population which will continue to enter adulthood and prime household formation years.</p> <p>Various forecasters, notably the UCLA Anderson Forecast, have noted that the aggregate effect of the State of California's housing policies—specifically those aimed at increasing zoned capacity and site availability in existing urbanized areas which have mutually-reinforcing policies and strategies in Connect SoCal—are responsible for a substantial share of the strong housing production seen in recent years.</p>

ID	COMMENT	RESPONSE
0001764.15.1	<p>District 8 Office of System Planning Comments on Connect SoCal 2024</p> <ul style="list-style-type: none"> The plan itself suggests priority development areas but doesn't focus on solutions to produce more housing. This was something we provided SCAG in our comments to the 2020 SoCal Connect Plan joint letter from the Caltrans Southern Districts. These suggestions could have served as regional planning policy guidance in the 2020 SoCal Connect Plan and the current 2024 SoCal Connect Plan. Instead, SCAG refers to its ability to support ongoing efforts that would drive efficiency in future local land use decisions, being a repository for data collection and making RTP/SCS plan supportive transportation improvement project selections that are part of Air Quality Conformity Determinations. SCAG made it clear it will limit itself to those areas going forward. Possibly this should be reconsidered and SCAG should have a larger role in shaping the region. 	<p>Comment noted. SCAG strongly encourages jurisdictions to consider the Connect SoCal Plan as part of local land use planning. The Plan includes an array of best practices, tools, resources, Regional Planning Policies and Implementation Strategies that will support efforts to increase housing production across the region.</p>
0001764.15.2	<ul style="list-style-type: none"> The plan notes that Relieving Bottlenecks (Pages 39 and 114) is a goal of the region related to improvement of "Goods Movement" and "Moving People" but it's not clear that this would not be in conflict with Zero Emissions Goals (Economy in 2050 Page 112) and Air Quality Goals (Environment Page 118). Relieving bottlenecks is also not likely consistent with the regions efforts to address Vehicle Miles Travelled and Greenhouse Gas Emissions reductions (Section 5 "Measuring our Progress" Pages 8 and 16). It's not clear that this policy would meet Statewide goals identified in the CAPTI, the CTP 2050 and the Smart Mobility Framework related to Vehicle Miles Travelled and Greenhouse Gas Emissions. 	<p>Comment noted. Improving air quality and travel time reliability (for both persons and trucks) and reducing GHG emissions are not mutually exclusive. As these are federal performance measures, SCAG and Caltrans must make progress on these simultaneously.</p>
0001764.15.3	<ul style="list-style-type: none"> The Top 100 Bottlenecks in the region are identified on Page 39. It appears that eliminating these bottlenecks would require multi-billions of dollars in spending on Freeway widening. Based on our previous experience with Freeway widenings, we believe that such widenings would increase Greenhouse House Gas Emissions and Vehicle Miles Travelled and only provide limited temporary congestion relief due to latent travel demand. It's also not entirely clear that current levels of congestion or the related need for Freeway widening will be as necessary if population declines keep occurring going forward. Freeway widening may also undermine ongoing major resources being targeted to support a shift to other travel modes such as transit, biking, and walking. 	<p>Comment noted. As the SCAG region is a designated non-attainment area, a congestion management process is followed which first evaluates multimodal, travel demand reduction, and operational management strategies. This is further illustrated through the mobility group of implementation strategies included in Connect SoCal 2024.</p>
0001764.16	<p>District 8 Office of System Planning Project Specific Comments on Connect SoCal 2024</p> <ul style="list-style-type: none"> During review of the draft 2024 SoCal Connect SCS/RTP Project List the Reimagining and Reconnecting Route 66 project did not appear to be listed. Please verify if this project is included, or that it's not. If it's not on the Project List currently, please provide the steps that need to be completed to add it. 	<p>Please see response to comment 0001691.01.</p>
0001764.17.1	<p>District 8 Active Transportation Branch Comments on Mobility Technical Report</p> <ul style="list-style-type: none"> In section 2.17.5, Mobility as a Service (MaaS), fare integration is cited as a key component to facilitate travel. While there is a mention of Cal-ITP, it would be beneficial for SCAG to take a greater lead in ensuring fare integration across county lines, across the SCAG six-county region, as well as potentially partner with the neighboring MPO, SANDAG. 	<p>Comment noted. Connect SoCal includes an Implementation Strategy to "Improve transit/rail frequency, reliability, and fare and scheduling integration across operators." SCAG continues to collaborate with Cal-ITP through the Regional Transit Technical Advisory Committee on several of the initiatives on fare integration and fare payments. SCAG is currently having discussions with Cal-ITP on potential open loop payment pilot projects.</p>

ID	COMMENT	RESPONSE
0001764.17.2	<ul style="list-style-type: none"> The current fare reciprocity structure underlies transit users starting from Metrolink to reach their destination, as a valid Metrolink ticket allows for free transfers to get to/ from stations. While that is beneficial for users who live and can commute (walk/ bike/ drive) to these train stations that are spaced miles apart, the user who starts from their home to get to a train station must bring a separate form of payment (i.e. a "pocketful of change") to utilize a bus to reach their transit station, or load up a different fare payment method for a personal mobility/ micro mobility vehicle (scooter or bicycle share) to get to a Metrolink station. In addition, there are multiple train stations along different Metrolink, as well as LA County Metro rail lines that charge for parking. These require a separate form of payment (i.e. digital wallet, cash, credit card) for each station, per mode and per county provider. Therefore, a casual or new transit user who begins their commute outside of Los Angeles County will need to bring their "pocketful of change" to pay for a bus or other transport form, then when transferring to another bus from a different provider, put more change into the farebox (since credit cards are not accepted for bus fare boxes), or use cash/ credit card to use Metrolink. Only when the transit user is in possession of a valid Metrolink ticket, they can reach their last mile transit provider without having to pay additionally, per Metrolink transfers to most local transit providers. 	<p>Comment noted. Connect SoCal includes the following strategy that supports creating transit/rail systems that connect more readily: "Enable a more seamless mobility experience through the implementation of Mobility as a Service (MaaS). This may include leveraging Cal-ITP's support, initiating open-loop payment demonstrations, and testing shared product systems and post-payment solutions." For reference, in 2022 SCAG completed the MaaS Feasibility White Paper to study the key building blocks for successfully implementing a MaaS system in the SCAG region, which would integrate transportation services into a single mobility platform to provide competitive alternatives over private vehicles, promote universal basic mobility, encourage mode shift, and foster sustainable travel choices.</p>
0001764.18.1	<p>District 8 Active Transportation Branch Comments on Mobility Technical Report</p> <ul style="list-style-type: none"> While the San Francisco Bay Area falls under MTC/ ABAG, a 9-county region, the regional MPO ensured that the Clipper Card is the universally accepted payment media across county, city, and regional transit (bus/ rail) providers, as well as transit station and SFO airport parking. Previous to 2010's Clipper Card introduction, MTC did not have the fare integration across county lines, as the earlier generation Translink card was not accepted by multiple transit agencies. Since the Clipper Card is accepted by 24 transit agencies across the nine-county San Francisco Bay Area region, it is possible to start and end a transit trip from a user's home, using multiple (bus, rail) transit providers or transit station parking payment, to their destination and back, with multi-agency transfers, fare capping and other user-friendly cost savings, without needing to begin a trip with a "pocketful of change". 	<p>Comment noted. Connect SoCal includes the following strategy that supports creating transit/rail systems that connect more readily: "Enable a more seamless mobility experience through the implementation of Mobility as a Service (MaaS). This may include leveraging Cal-ITP's support, initiating open-loop payment demonstrations, and testing shared product systems and post-payment solutions." For reference, in 2022 SCAG completed the MaaS Feasibility White Paper to study the key building blocks for successfully implementing a MaaS system in the SCAG region, which would integrate transportation services into a single mobility platform to provide competitive alternatives over private vehicles, promote universal basic mobility, encourage mode shift, and foster sustainable travel choices.</p>
0001764.18.2	<ul style="list-style-type: none"> SCAG should strive to achieve transit and vehicle parking user integration in order to remove confusion with different mobility "wallets", especially given the push for a universal basic mobility wallet that is being utilized in some Los Angeles County jurisdictions. 	<p>Comment noted. Connect SoCal includes the following strategy that supports building more seamless connections: "Mobility as a Service (MaaS): Enable a more seamless mobility experience through the implementation of MaaS. This may include leveraging Cal-ITP's support, initiating open-loop payment demonstrations, and testing shared product systems and post-payment solutions." For reference, in 2022 SCAG completed the MaaS Feasibility White Paper to study the key building blocks for successfully implementing a MaaS system in the SCAG region, which would integrate transportation services into a single mobility platform to provide competitive alternatives over private vehicles, promote universal basic mobility, encourage mode shift, and foster sustainable travel choices. The Mobility Technical Report details additional strategies (e.g., mobility hubs, etc.) and investments that support growth towards this vision. SCAG continues to collaborate with Cal-ITP through SCAG's Regional Transit Technical Advisory Committee on several initiatives related to fare integration and payments.</p>

ID	COMMENT	RESPONSE
0001764.18.3	<ul style="list-style-type: none"> In Section 3, Active Transportation, first and last mile should cover more than existing transportation networks. It has been generally acknowledged by state and federal agencies that the development of the National Highway System/ Interstate Freeway System led to divisions across communities, especially among areas of low income and racial makeup. In more urbanized areas, accommodations for bicyclists and pedestrians in the form of pedestrian overcrossings (POC) and pedestrian undercrossings (PUC) were constructed. District 7 has over 150 POCs and PUCs; District 8 has only 4 POCs and 3 PUCs and District 12 has 13 POCs and 2 PUCs. In addition, freeway interchanges and bridges are much closer together in the urban areas (especially in District 7), limiting the impact of divided communities, as opposed to typically one mile (or greater) separation between bridge structures or interchanges in less dense areas. Combined with existing railroad infrastructure, these adversely impact vulnerable road users, especially schoolchildren who live on one side of a freeway or railroad track that are enrolled in a school on the other side of the freeway or railroad track, greatly increasing their walking or bicycling distance. 	<p>Comment noted. Connect SoCal includes the following Reconnecting Communities strategy: Streets and Freeways: Reconnect communities by removing, retrofitting or mitigating transportation facilities such as highways or railways that create barriers to community connectivity. To that end, SCAG recently received federal funding to develop a Highways to Boulevards Regional Study (Study), which will identify opportunities to reconnect communities by removing, retrofitting, or mitigating transportation facilities such as highways or railways that create barriers to community connectivity. SCAG has kicked off the Study and is currently engaging stakeholders from across the region, including Caltrans. In addition, SCAG submitted an application to the Sustainable Transportation Planning grant program, under the Strategic Partnerships component, for the Planning for Main Streets project. This project proposes to partner with Caltrans and local jurisdictions to conduct planning studies for several State highways in the SCAG region which serve as community corridors (or "Main Streets") but also have gaps in accessibility, safety, and connectivity that may divide a community or function as a barrier for vulnerable road users. If successful, the project would support improving first and last mile connections.</p>
0001764.19	<p>District 8 Active Transportation Branch Comments on Mobility Technical Report</p> <ul style="list-style-type: none"> This section should expand upon added distances that schoolchildren, transit users and other non- drivers must traverse to cross a transportation barrier in order to get to their home or school. In addition, street network gaps (i.e. walking and biking distances to cross a transportation-caused barrier) should be taken into consideration for future development of local networks (bikeway, sidewalk, road). The USDOT Reconnecting Communities and Neighborhoods grant funding opportunities exist to help address previous decisions/ transportation projects that adversely affected the mobility of communities along or across transportation infrastructure. 	<p>Comment noted. Connect SoCal includes the following Reconnecting Communities strategy: Streets and Freeways: Reconnect communities by removing, retrofitting or mitigating transportation facilities such as highways or railways that create barriers to community connectivity. To that end, SCAG recently received federal funding to develop a Highways to Boulevards Regional Study (see Section 4.8.3 of the Mobility Technical Report), which will identify opportunities to reconnect communities by removing, retrofitting, or mitigating transportation facilities such as highways or railways that create barriers to community connectivity. The Highways to Boulevards Regional Study furthers Connect SoCal's vision for a more resilient and equitable future. SCAG has kicked off the Study and is currently engaging stakeholders from across the region, including Caltrans.</p>
0001764.20.1	<p>District 8 Active Transportation Branch Comments on Equity Analysis Technical Report</p> <ul style="list-style-type: none"> Pertaining to Priority Equity Communities (PEC); SCAG acknowledges that there are multiple equity area definitions, such as SB 535 DAC, Climate and Economic Justice Screening Tool (Federal - Council on Environmental Quality), Free and Reduced Priced Meals and others mentioned in the Executive Summary. However, there is not a mention of the reasons that led SCAG to create a "new" regional equity area definition when other definitions and data already exist on regional, state and federal levels. 	<p>Comment noted. Section 4.2 of the Equity Analysis Technical Report provides reasons for developing a new equity area definition, namely that the use of multiple equity areas in environmental justice analysis can be confusing. In Connect SoCal 2020, SCAG defined two "equity areas," Communities of Concern and Environmental Justice Areas, and included a comparison to SB 535 Disadvantaged Communities. The development of Priority Equity Communities simplifies the Equity Analysis approach, while also specifically highlighting transportation equity issues within each SCAG county. SCAG continues to monitor the development of other equity areas, including Caltrans' Transportation Equity Index, which was only released in a beta format at the time of Plan preparation.</p>
0001764.20.2	<ul style="list-style-type: none"> Federal and state grant programs require the applicant to identify whether the location of the proposed project will lie within a disadvantaged community. Though it is permissible to use a local/ regional equity area definition, this leads to a confusion of different available equity area definitions already in existence and SCAG's PEC is just another one to add to a disadvantaged community definition. With multiple local and regional definitions already invented and used by other agencies across the SoCal districts, what would be the appropriate definition that will be accepted by the different grant issuers, and how will these locally or regionally defined equity area definitions, such as SCAG's PEC be viewed and fairly evaluated when such applications are scored, should the applicant use SCAG's PEC (or other local/ regional equity area definitions) in the application? 	<p>Comment noted. SCAG will continue discussing the potential utilization of Priority Equity Communities, including consideration in future funding applications developed by SCAG and in coordination with local, state, and federal equity area definitions. SCAG is committed to ensuring that equity is a central consideration in all funding opportunities. The Surface Transportation Block Grant and Congestion Mitigation and Air Quality Improvement program guidelines (released in 2023) awards points to projects that directly and/or indirectly benefit Priority Equity Communities.</p>

ID	COMMENT	RESPONSE
0001764.21.1	<p>District 8 Active Transportation Branch Comments on Equity Analysis Technical Report</p> <ul style="list-style-type: none"> In Section 4.2, there is a mention that PEC builds off previous efforts, including Transportation Equity Zones (TEZ). There's a likeliness that TEZ data, being from past efforts, may become or already be dated, given changing economic, housing and transit conditions and levels of service. Variables such as transit agencies making service modifications (i.e. service hour and frequency cuts during the COVID-19 public health manifestation) affects transit dependent populations and vulnerable road users much more adversely in less densely populated areas than in urban areas. This is due to lack of sufficient headways on corridors that lack redundant transit options. In areas that receive 5311 FTA rural transit funding, including the majority of transit agencies operating in District 8 (as opposed to two in District 7 or none in District 12) run headways of equal or greater than 60 minutes. From an equitable standpoint, a level of minimum transit service reaches more per capita in urban areas, with transit being merely one example. 	<p>Comment noted. The Limited Vehicle and Transit Access component of Priority Equity Communities excludes census tracts intersecting or adjacent to a High-Quality Transit Corridor (HQTC). To ensure the HQTC network included the latest available information, SCAG staff confirmed transit services with local transit operators in 2023. There are no HQTCs in the Inland Empire. The most recently available sociodemographic data was used to develop Priority Equity Communities. The only component of Transportation Equity Zones that was used to develop Priority Equity Communities is the feedback provided from community partners, as described in the 2022 Mobility Innovations and Pricing report. Transportation Equity Zones were used in Section 9.4 of the Equity Analysis Technical Report as they were specifically developed to inform discussion related to road pricing programs. It should be noted that the census tracts used for the two case studies in Section 9.4 are both designated Transportation Equity Zones and Priority Equity Communities.</p>
0001764.21.2	<ul style="list-style-type: none"> Furthermore, there are other variables that affect the population. The graphic (that neither is referred to as a figure or table) between Table 3 and Figure 1 on Page 22 (PDF page 24) provides the population criteria that feeds into whether a census tract is designated as a PEC. Zero of these criteria include air pollution, which is far higher in the inland regions, as much of the air remains stagnant, bounded by the mountains that surround the region. Other equity area definitions include air quality in their criteria. Referring to Figure 1, given that the technical document specifically mentions (elsewhere) that Orange County population tends to have less residents commuting outside of the county for employment and generally greater vehicle and transit access than other counties, the percentage of those living in a PEC seems unusually high, with the inland counties being unusually low. In addition, the population density of Orange County is much higher than most of the other counties within the SCAG region and therefore it is peculiar that so many of the population resides in a PEC. 	<p>Comment noted. The Priority Equity Communities criteria focus on the socioeconomic and sociodemographic situation at the individual and household levels so that the analysis can evaluate the larger environmental situation. In Section 8.2 of the Equity Analysis Technical Report, SCAG evaluates air pollution impacts as a performance measure of the Plan; if SCAG included air pollution exposure as part of Priority Equity Communities, the equity area would be biased and pre-disposed to underperform compared to the region. Several equity area definitions already define the areas of greatest need based on environmental factors (e.g., CalEnviroScreen 4.0 census tracts with the greatest pollution burden score) that could be used in tandem with Priority Equity Communities. Due to the unique demographic landscape and differences across the SCAG region, and following feedback from the development of Transportation Equity Zones, the methodology for Priority Equity Communities depends on county-level averages, as opposed to a regional average. This allows SCAG to balance county-specific concerns while providing the statutorily-required evaluation of the region as a whole.</p>
0001764.21.3	<ul style="list-style-type: none"> In Sections 5 and 6, it may be useful to break down the demographic data by county within the tables, since each county's population does not have an equal composition of race and ethnicity, as well as socioeconomic data. 	<p>Table 7 and Figure 4 of the Equity Analysis Technical Report are updated to incorporate county-level data. For the analysis sections of the Equity Analysis Technical Report (Sections 6 to 9), SCAG is statutorily required to evaluate impacts at the regional level, and to summarize the results for each county could expand this report to an unmanageable, inaccessible scale.</p>
0001764.22	<p>District 8 Active Transportation Branch Comments on Equity Analysis Technical Report</p> <ul style="list-style-type: none"> Section 8 elaborates differences between census tracts that are designated PEC and non PEC, however these results appear to be based on factors from the population criteria, but without using any environmental criteria (see the graphic that neither is referred to as a figure or table between Table 3 and Figure 1 on Page 22/ PDF page 24). 	<p>See response to comment 0001764.21.2.</p>
Submitted by	Caltrans	Submittal 0001765
0001765.01	<p>Caltrans District 11 District 11, Various Offices Comments on Project List Technical Report</p> <p>It is recommended to make the following changes to the Project List Technical Report:</p> <ul style="list-style-type: none"> Page 163 - Suggesting a revision to the project description of FTIP ID IMP190201 project (SR-186 realignments and construction of new bridge over the All-American Canal). This project is currently funded for PA&ED phase only. Page 163 - (1) Scheduled CCA date of RTP ID project 612003 (Route 98 widening from Ollie Avenue to Dogwood Road) is 8/30/2024. (2) Project cost and year of completion of RTP ID project 6120009 (Improve I-8/SR-186 Interchange) To Be Determined (reassessed). 	<p>Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. Please work with Imperial County Transportation Commission to modify the projects described.</p>

ID	COMMENT	RESPONSE
0001765.02	<p>District 11 Office of Multi-Modal System Planning Comment on Connect SoCal 2024</p> <p>1. In Chapter 2, on page 67, it is stated that the I-8 Imperial Avenue Interchange in the City of El Centro was reconstructed as a diamond-type overcrossing. However, this interchange was reconstructed as a standard 4 lane overcrossing, not a diverging diamond interchange.</p>	The text is updated.
0001765.03	<p>District 11 Office of Multi-Modal System Planning Comments on Project List Technical Report</p> <p>It is recommended to make the following changes to the Project List Technical Report:</p> <ul style="list-style-type: none"> • On page 4 (FTIP ID 515) and page 163 (RTP ID 6120002), it should be noted that the reconstruction of the I-8 interchange at Imperial Ave has already been completed. The design did not incorporate a diverging diamond layout. Including completed projects in the plan may not be necessary. • On page 163 (RTP ID 6120003), it should be noted that road widening on SR 98 from Rockwood Ave to Ollie Ave in the City of Calexico has already been completed. Including completed projects in the plan may not be necessary. • On pages 163, 432, and 433, for all widening projects on Caltrans highways, we suggest adding language about operational improvements as the recommended short-term solution with the potential to widen in the future. Please refer to CAPTI, pages 18 and 19, for additional guidance on this topic. 	<p>Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. FTIP Project ID #0515 and #IMP161001 have not been identified as completed in the 2023 FTIP. Once the projects are identified as completed in the current FTIP, we will remove from the Project List Technical Report. Please work with Imperial County Transportation Commission to modify the projects noted for operation improvements.</p>
0001765.04.1	<p>District 11 Office of Multi-Modal System Planning General Comments</p> <p>1. Recommend including more discussion on how the plan complies with Title VI in the body of the report; or including a sentence stating that more information on this topic can be found in the Equity Analysis Technical Report.</p>	<p>Chapter 1, Section 1.1 at the end of the paragraph under "Plan Requirements," add "In addition, the focus on equity in this Plan supports compliance with Title VI of the Civil Rights Act of 1964 and Environmental Justice guidance at the state and federal levels, all of which is further detailed in the Equity Analysis Technical Report."</p>
0001765.04.2	<p>2. Recommend including more discussion on the importance of Ports of Entry (POEs) along Mexico border in the body of the report; or including a sentence stating that more information on this topic can be found in the Goods Movement Technical Report.</p>	<p>The description of the Goods Movement Technical Report provided in Chapter 1, Section 1.4, is updated to include Ports of Entry.</p>
0001765.04.3	<p>3. Recommend including more discussion on how the plan supports the vision of state planning documents such as CAPTI and CTP 2050 and local plans in body of report; or including a sentence stating that more information on this topic can be found in the Mobility Technical Report.</p>	<p>Comment noted. The introduction to the Technical Reports in the Main Book provides a summary of what is included in each Technical Report and notes that additional information on Plan elements can be found there.</p>
0001765.05.01	<p>Caltrans District 12 District 12, Various Offices Comments on Connect SoCal 2024</p> <p>1. Page 31, "Active Transportation" - Recommend discussing the rising popularity of e-bikes.</p>	<p>The following description of active transportation is updated to include e-bikes, "During the pandemic, the region saw an increased use of active transportation (i.e., bicycling, walking, rolling, etc.)." It now reads: "During the pandemic, the region saw an increased use of active transportation (i.e., bicycling (including via e-bikes), walking, rolling, etc.)."</p>
0001765.05.02	<p>2. Page 34, "Clean Energy Transition" - Consider including a small note about the challenges facing the uptake of new technologies (e.g. implementation of ZEV infrastructure).</p>	<p>Comment noted. The following paragraph has been added: "Despite these policies and regulation, there are significant challenges in adopting these new technologies. Barriers include high upfront costs, technology readiness, lack of charging and fueling infrastructure, lack of consumer knowledge and awareness, and regulatory support."</p>
0001765.05.03	<p>3. Page 40, Map 2.2 "Existing Transit Network (2019/2022)" - Why does the map depict the transit network from two different years? This should either be explained in the narrative, or the title should be revised.</p>	<p>SCAG is revising the text to read: "Map 2.2 Existing Transit Network (2019)." The map is based on 2019 model network data.</p> <p>For reference, the prior text reads: "Map 2.2 Existing Transit Network (2019/2022)."</p>
0001765.05.04	<p>4. Pages 65-67, "Plan Implementation" - Please consider listing one of Caltrans District 12's (Orange County) 2020 FTIP projects such as the I-405 Improvement Project (2020 FTIP ID: ORA030605).</p>	<p>The I-405 Improvement Project is added to the Plan Implementation section of Chapter 2.</p>

ID	COMMENT	RESPONSE
0001765.05.05	5. Page 88, "Complete Streets" - Provide a more robust definition of Complete Streets – i.e., include the transportation modes that Complete Streets are designed for, such as walking, bicycling, transit, driving, etc. Refer to page 93 as an example.	The Complete Streets description is updated from: "Complete Streets, which are planned, designed, operated and maintained for safe, convenient and comfortable access and travel for users of all ages and abilities, will support people walking, bicycling and using micromobility devices." to: "Complete Streets are roadways designed to support the safety, comfort and mobility for all road users. They are accessible to people of all ages and abilities, regardless of whether they are driving, walking, bicycling, using micromobility devices, or riding transit/rail."
0001765.05.06	6. Page 88, "Transit and Multimodal Integration" - Consider mentioning that easy/seamless transitions/connections between modes of transportation (e.g., first/last mile connections) encourage the use of transit and other alternative modes of transportation, such as walking and bicycling.	SCAG is revising the text to read: "Strategies for improving the transportation system are dependent on integration with our growth and land use patterns. The availability, access and efficiency of different modes, including transit/rail, walking, bicycling and other forms of active transportation—including driving—all depend on a close relationship with how our region uses land and how we grow. This is particularly true when it comes to improving and building a transit/rail system that can best serve people in communities throughout our region. Encouraging shifts in the modes people use also depends on the implementation of strategies supporting more seamless connections across modes, especially via first/last mile connection, those occurring between transit/rail and biking, walking, or rolling, and ensuring platforms exist to facilitate trip planning and payments." For reference, the prior text reads: "Strategies for improving the transportation system are dependent on integration with our growth and land use patterns. The availability, access and efficiency of different modes, including transit/rail, walking, bicycling and other forms of active transportation—including driving—all depend on a close relationship with how our region uses land and how we grow. This is particularly true when it comes to improving and building a transit/rail system that can best serve people in communities throughout our region."
0001765.05.07	7. Pages 88-89, "Mobility Policies and Strategies" - In addition to the smart/dynamic parking strategy listed in ITS, include other parking-related strategies; for example, parking benefit districts, employer cash-out programs, and reducing or eliminating off-street parking requirements. These can be included under TDM.	Comment noted. SCAG promotes a comprehensive set of TDM strategies as described in the TDM Toolbox of Strategies in the Connect SoCal Congestion Management Technical Report, including a number of parking related TDM strategies like parking cash out. The Chapter 3 Implementation Strategies represent priorities for SCAG efforts, which at this time do not include the commentor's suggested activities.
0001765.05.08	8. Page 89, "Mobility Policies and Strategies" - Include examples of technology designed to enhance the efficiency and convenience of transit, especially surface transit (e.g., transit signal priority, all-door boarding).	Comment noted. This section of the report is a brief overarching description of Technology Integration. SCAG's support for dedicated transit lanes and transit priority treatments is more fully addressed in the Mobility Technical Report's Transit/Rail Chapter (see p. 96), which reflects SCAG's recent work on the Regional Dedicated Lanes Transit Lanes Study, which included a Transit Priority Best Practices Report.
0001765.05.09	9. Page 94, Map 3.1 "Planned Transit Network" - It is difficult to distinguish "Rapid Bus and Bus Rapid Transit" from regular "Bus Routes" on this map.	Comment noted. The maps provided within Connect SoCal are intended to be viewed at a high level to understand the distribution of routes across the region. SCAG recommends zooming in on the map for more clarity. More datasets and interactive maps will become available after Plan adoption.
0001765.05.10	10. Page 94, Map 3.1 "Planned Transit Network" - Put the projected year in the title.	SCAG is changing map title to read: "Map 3.1 Planned Transit Network (2050)." For reference, the original map title reads: "Map 3.1 Planned Transit Network."
0001765.05.11	11. Page 114, "Complete Streets" or "Transit and Multimodal Integration"- Consider directly linking Complete Streets/Active Transportation and Transit, as first/last mile connections between modes can encourage people to utilize active transportation and/or transit.	Comment noted. The link between Complete Streets/Active Transportation and Transit is addressed in Mobility Strategy 03, under Complete Streets, by referencing a multimodal network that is conducive to a variety of modes: "Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit)." In addition, as described throughout the Plan, Connect SoCal envisions a future where transportation is efficient, multimodal, and accessible to all. The Active Transportation and Transit/Rail sections of the Mobility Technical Report also account for first/last mile strategies to support modal integration.

ID	COMMENT	RESPONSE
0001765.06	<p>Caltrans District 12 District 12, Various Offices Comments on Connect SoCal 2024 12. Page 115, "Safety" - Consider specifically noting safety for vulnerable road users (e.g., active transportation users). Vulnerable road users face disproportionate safety impacts, and a specific note about vulnerable road users' safety calls attention to the importance of providing safe and comfortable infrastructure for these users. This would also connect to and support the "Transportation Safety" Key Mobility Challenge on page 43 and the "Safety" Implementation Strategy on page 89.</p>	<p>Regional planning policy #22, under Mobility, is updated to reference vulnerable road users. The policy was updated from: "Eliminate transportation-related fatalities and serious injuries on the regional multimodal transportation system." to: "Eliminate transportation-related fatalities and serious injuries (especially those involving vulnerable road users, such as people, especially older adults and children, walking and biking) on the regional multimodal transportation system."</p>
0001765.07	<p>Caltrans District 12 District 12, Various Offices General Comments on Connect SoCal 2024 1. There is an effort to turn State conventional highways into people-centered "Main Streets" that incorporate complete streets and improve intermodal access. SCAG is working with Caltrans to create a plan incorporating these 'Main Street' elements into State Routes within the SCAG region. Consider including "Main Street" efforts in Regional Strategic Investments, Active Transportation, or other applicable sections. 2. Consider establishing a more comprehensive and robust "first/last" mile strategy and network for the region to facilitate transit use. 3. Please include additional references or data summarizing input received from cyclists and other active transportation participants in applicable sections.</p>	<p>Comment noted. (1) Section 4.3.2 of the Mobility Technical Report includes Main Streets, including State Highway Main Streets, and relatedly, Section 4.8.3 includes the Reconnecting Communities Program and SCAG's Highways to Boulevards project, which shares goals with Main Streets. (2) First/last mile strategies are distributed throughout the plan, such as in Chapter 3.3 of the Plan, in Complete Streets strategy 05 (Complete Streets designs to suprt first/last mile connections to transit), and in Chapter 3.4 of the Plan, under Transit and Multimodal Integration strategies to plan for and develop mobility hubs. In addition, the Mobility Technical Report covers first/last mile strategies throughout the report, such as in sections 1.9.2, 2.13, and 2.17.2. (3) Section 1.6 of the Mobility Technical Report describes stakeholder and public input, including for active transportation, that was gathered through in-person and virtual workshops. More detailed information on outreach, including the full survey results, can be found in "Public Outreach Findings" section of the Public Participation & Consultation Technical Report.</p>
0001765.08	<p>District 12, Various Offices Comment on Congestion Management Technical Report • Page 51, "Car Pooling and Vanpooling" - Consider mentioning the network of Park and Ride lots in the region and opportunities or strategies to convert those to Mobility Hubs.</p>	<p>SCAG is adding language that describes the opportunity to support carpooling and vanpooling via park and ride lots that may evolve to become mobility hubs.</p>
0001765.09	<p>District 12, Various Offices Comment on Mobility Technical Report • Page 203, Map 4-2 "SCAG Regional Express Lanes Network" - The limit of the "Planned_DualLane_Segments_2" line on I-5 in Orange County should end at SR 91. The thick blue line seems to be going beyond SR 91. Blue points representing "Proposed HOV-HOT" should be added to interchanges at I-5/SR 91, I-5/SR 57, and I-5/SR 55.</p>	<p>SCAG Regional Express Lanes Network map is changed indicated that the dual lane segment of the planned I-5 segment in Orange County ends at SR 91. Blue points representing "Proposed HOV-HOT" are added to interchanges at I-5/SR 91, I-5/SR 57, and I-5/SR 55.</p>
0001765.10	<p>District 12, Various Offices Comments on Project List Technical Report Financially Constrained Projects: 1. Page 254, Project RTP ID: "2M0717-ORA131105" - Amend Completion Year to 2035, Project Cost to \$241 million, and Lead Agency to Orange County Transportation Authority (OCTA). 2. Page 254, Project RTP ID: "2M0735A" - Amend Project Cost to \$85 million. 3. Page 256, Project RTP ID: "2M0719" - Amend Completion Year to 2027. 4. Page 257, Project RTP ID: "2M0732" - Amend Lead Agency to Caltrans and Project Cost to \$456.4 million. Note: Caltrans District 12 has begun coordination with SCAG to amend the Lead Agency. SCAG has since notified OCTA of their intent to update the Lead Agency to Caltrans for this project on the Financially Constrained Project List.</p>	<p>Comment noted. Following are the responses as noted numerically in the comment: 1. RTP Project ID #2M0717 reflects a completion year of 2035 and therefore no change was made in the Final Project List Technical Report. Amending the project cost to \$241 million would be inconsistent with OCTA's 2023 Next Delivery Plan, so please coordinate the project cost update with OCTA to ensure consistency. 2. RTP Project ID #2M0735A was not revised due to the inconsistency it would create with OCTA's 2023 Next Delivery Plan. Please coordinate the project cost update with OCTA to ensure consistency. 3. RTP ID #2M0719 is updated to reflect a completion year of 2027. 4. The lead agency is amended to Caltrans for RTP ID #2M0732 (See Comment #000.1771.02) and the project cost is updated to \$456.4 million.</p>
		<p>The requested project changes are determined to have an insignificant effect on outcomes from Connect SoCal 2024 or the PEIR determination. The requested project changes will have no impact on transportation modeling, increases in criteria pollutants or GHG emissions, and only a minor effect on fiscal constraint.</p>
Submitted by	Center for Community Action and Environmental Justice	Submittal 0001709

ID	COMMENT	RESPONSE
0001709.01.1.1	<p>Hi, good evening everyone. I'm Ana Gonzalez, Executive Director at the Center for Community Action and Environmental Justice, representing over 50 community members from San Bernardino County that participated in surveys and workshops.</p> <p>As you know, we're walking through this journey of the Connect SoCal plan. And, I wanted to share a couple of comments that resonated a lot with community members, when introducing this potential plan with our community members. And I wanted to echo a lot of the things that were said within our community members, especially those in rural communities and in more of the inland communities that are seeing proliferation of warehousing in their backyards.</p> <p>So first and foremost, I guess they wanted to get more of an understanding of what type of projects SB1 funding contributes to when it comes to Inland Empire communities. I understand that, you know, some of the funds are used for repairs of road degradation or improvements, like, such as sidewalks, and all of that. But I guess community feels like there's not transparency process when it comes to cities producing these reports of how the funds are being used. So, they would like to see more transparency on that end.</p>	<p>Comment noted. While each city or county may have this information available in a different place on their websites, cities and counties must submit a proposed project list to the California Transportation Commission to be eligible to receive SB 1 Local Streets and Roads Program funds. SB 1 Local Streets and Roads Program dollars can be used for basic road maintenance, rehabilitation, and critical safety projects. The annual proposed project lists submitted by cities and counties can be accessed at: https://catc.ca.gov/programs/sb1/local-streets-roads-program.</p>
0001709.01.1.2	<p>And what are the plans, for the next several years and that funding? - Keeping in mind that we're, you know, going through this transition of electric cars, and we understand that some of that SB1 funding will eventually start to decline...once that transition happens to electric vehicles?</p>	<p>Comment noted. The Transportation Finance Technical Report provides further details on financial strategies and analysis included in the financial plan. The transition to zero-emission vehicles is a key challenge to future transportation funding in the SCAG region. The Transportation Finance Technical Report discusses this challenge and strategies to transition the region to more sustainable and equitable future sources of transportation funding.</p>
0001709.01.2	<p>I saw your presentation...a very interesting part where you talked about that there's potentially 2 billion dollars of preservation of natural lands, clean transpor(tation), and environmental initiatives.</p>	<p>Comment noted. This was a reference to the different Regional Strategic Investments included in Connect SoCal 2024. For more details on the Clean Transportation and Natural and Agricultural Lands Preservation investments, see Chapter 3.</p>
0001709.02.1	<p>And, I know that was brought back as a comment from our community members, because of their concerns of the disappearance of prime farmland when it comes to, again, building of warehousing and taking over a lot of these... and not more of, like, the dairy farm aspect of it: but, more on, like, the potential that there is in regenerative farming of those farms that have produced food over the years in the Inland Empire. So they feel this concern that if we get rid of all these prime farmland areas that we're gonna become more of a food desert in the Inland Empire, as we as we already have, you know, communities that don't even have a grocery store within a mile away. You know, we can create opportunities for regenerative farming where those communities that don't have grocery stores near to them that they can, you know, look for those opportunities for community gardens and stuff like that, or some...I'm sorry...Farmers markets and such.</p>	<p>Comment noted.</p>
0001709.02.2	<p>Okay, I just have one more thing. I'll wrap it up. Okay? And then when it comes to the housing element, I saw that, you know, part of this plan is to create a housing element support. San Bernardino County has the highest percentage of cities out of compliance with the housing element. And with that comes, you know, these plans of mass transit and public transportation opportunities when we're building housing. So, we would like to see more of that support with cities, especially those that are not in compliance at the moment. And that's all I have. Thank you.</p>	<p>Comment noted. SCAG identified an implementation strategy focused on providing jurisdictions with housing technical assistance support.</p>
Submitted by	Center for Community Action and Environmental Justice	Submittal 0001743

ID	COMMENT	RESPONSE
0001743.01	<p>Letter attached.</p> <p>This letter is being submitted on behalf of the Center for Community Action and Environmental Justice to respond to the comment period for Connect SoCal, the 2024 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2024 Connect SoCal provides a number of goals, ideals, and solutions to problems facing the region as a whole and beyond. After reviewing the document, the following comments are being provided in appreciation of the work being done as well as seeking to see an improvement in areas which continue to need support to ensure that the plan truly delivers for all.</p>	Comment noted.
0001743.02	<p>In Section 1.5.1 Planning and Policy Contexts of the Mobility Technical Report, several of the requirements which SCAG's Connect SoCal is supposed to meet are listed, including the California Transportation Plan, Interregional Transportation Strategic Plan, Climate Action Plan for Transportation Infrastructure, Caltrans' Smart Mobility Framework, and the Caltrans Active Transportation Plans. However, missing from the list is the CARB Scoping Plan goal of reducing per-capita VMT by 25% relative to 2019 levels by 2030.[Footnote 1] It is imperative that this update of Connect SoCal address that subject and identify the steps and strategies that would be used to meet the goal.</p>	<p>Comment noted. The Scoping Plan, developed by CARB, details how the State will achieve its GHG emission reduction targets. While VMT reduction targets and strategies are included in the Scoping Plan, these targets are not regulatory requirements, but will inform future planning processes. Just as prior Scoping Plans informed the current 19 percent GHG emission reduction target that CARB set for SCAG, CARB may consider the VMT reduction targets in the Scoping Plan when setting new GHG emission reductions for SCAG in 2026.</p>
0001743.03	<p>As the biggest MPO in both the state and country and covering nearly half of the state's population, SCAG is indispensable to meeting that goal. Additionally, with Connect SoCal being completed on a four-year cycle, the next Connect SoCal after this would not be completed again until 2028, less than three years from the goal target date of December 31, 2030. If not addressed in the present Connect SoCal, SCAG would undoubtedly face daunting challenges to do their part to meet that goal at that time in a greatly reduced timeline.</p>	<p>Comment noted. While Connect SoCal is updated every four years, SCAG can amend the Plan as needed between these updates.</p>
0001743.04	<p>Another issue we would like to address are the impacts of the Goods Movement Technical Report on vulnerable communities in the SCAG region, including the hard-hit Inland Valley region which has endured an explosion of the siting of goods movement facilities in communities which are in many instances, already overburdened. A worrying trend is seen in the box on page 59 where there are concerns that the "share of international trade" to the US is coming through the SCAG region even as Table 6. National and Regional Trade Value Growth (2012-2022) shows that the 10-Year Total Growth has increased by 24.5% over the same time period. Clearly, and as mentioned in several other portions of the report, the total amount of trade through the region continues to increase by healthy amounts, even if the national share is decreasing. But a declining share due to more trade overall leading to more trade to other places is a completely separate issue from a declining share due to an outright decline. The latter is not what we are experiencing at all.</p>	<p>Comment noted. The report as indicated in Table 6 does identify growth in regional total trade value through 2022.</p>
0001743.05	<p>The Plan includes an overview of the steps being taken to improve the lived experience of those in the frontline communities subject to the onslaught of by way of reducing the emissions from the goods movement sector. It is good to see that the topic is getting some attention, but we would like to reiterate the point of needing those investments to be prioritized in the communities most impacted by the industry. Additionally, greater protections need to be put in place to ensure that continued expansion of the industry does not come at the expense of the frontline communities.</p>	<p>Comment noted. The Goods Movement Technical Report acknowledges that impacted communities, particularly those near transportation corridors and distribution centers, often bear the disproportionate burden of poor air quality and its associated health risks. This disparity underscores the importance of addressing the equity implications of goods movement and ensuring that informed measures are taken to protect the health and well-being of vulnerable communities.</p>

ID	COMMENT	RESPONSE
0001743.06	Thank you for this opportunity to review the Plan and provide comments. We look forward to seeing a final Plan which addresses the issues, including putting the issues of frontline communities at the forefront of all planning efforts and makes the investments necessary to protect them from the onslaught of the goods movement industry and other headwinds which continue to impact them.	Comment noted.
Submitted by	Center for Demographic Research	Submittal 0001706
0001706.01	<p>The following comment letter is being submitted on the Draft 2024 Connect SoCal Plan and associated Technical Reports.</p> <p>January 11, 2024</p> <p>Attn: Connect SoCal Team Southern California Association of Governments 900 Wilshire Blvd., Ste. 1700 Los Angeles, CA 90017 update@scag.ca.gov Uploaded via: https://scag.ca.gov/connect-socal-2024-comment-submission-form</p> <p>SUBJECT: DRAFT 2024 RTP/SCS "CONNECT SOCIAL" PLAN AND TECHNICAL REPORT COMMENTS</p> <p>Dear Connect SoCal Team:</p> <p>The Center for Demographic Research (CDR) at Cal State Fullerton has reviewed the Draft 2024 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS, "Connect SoCal 2024"), its associated technical reports, and the growth forecast dataset. We greatly appreciate the opportunity to do so and for all of the work SCAG staff has done to produce these reports and the work with local agencies during the development process. We also want to extend our thanks for the close coordination between SCAG and CDR on behalf of Orange County jurisdictions—and especially during the Local Data Exchange (LDX) process—to ensure the 2024 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current and recent construction; open space; and general plan densities.</p>	Comment noted.
0001706.02	CDR also supports the continued use of the 2024 growth forecast development process that incorporated SCAG's growth vision and policies into the initial growth forecast provided to local jurisdictions for review.	Comment noted.

ID	COMMENT	RESPONSE
0001706.03	In past iterations, CDR—along with many other agencies throughout the region—encouraged SCAG to incorporate policies and growth visioning into the initial draft growth forecast and to provide that information to jurisdictions to review and revise with updated information as part of the local jurisdiction outreach process. We applaud that SCAG’s development process for the 2024 Plan utilized this recommendation and support the continued use of the 2024 growth forecast development process in future iterations. The fact that the Plan is able to meet its prescribed targets with a growth forecast that includes SCAG’s growth visioning and policies along with original data from local jurisdictions is a great success, and we support the continued use of this process in future iterations. Though we understand SCAG only requested jurisdiction input on the growth forecast for housing and employment, we encourage SCAG to coordinate more closely with local agencies on the related population forecast in future iterations.	Comment noted.
0001706.04	We would like to express support for the recommendations by the Orange County Council of Governments, the Orange County Transportation Authority, Transportation Corridor Agencies, and other Orange County agencies whose comments support Connect SoCal 2024 with its use of the Orange County’s growth forecast, the 2022 Orange County Projections, provided during the LDX.	Comment noted.
0001706.05	We ask for your consideration and response to the following comments: 1. Support the continued use of the growth forecast information provided by local jurisdictions in future Plan iterations so that all development agreements; entitlements; current construction and recent construction; open space; and general plan densities are accurately reflected.	Comment noted.
0001706.06	2. Continue to use the 2024 LDX process in future Plan iterations whereby the growth visioning and policies are incorporated into the initial draft growth forecast that is provided to local jurisdictions for review at the beginning of the jurisdictional outreach and feedback (LDX) process.	Comment noted.
0001706.07	3. Oppose the selection of any alternatives in the draft PEIR that do not properly reflect entitlements; development agreements; current and recent construction; open space; and general plan densities in Orange County.	For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-2 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001706.08	4. Revise and add the Connect SoCal consistency determination language provided in OCCOG’s comment letter to the main RTP/SCS document, the response to PEIR comments, the Demographics and Growth Forecast Technical Report, and the Land Use and Communities Technical Report.	Consistency language added to Demographics and Growth Forecast Technical Report Section 5.5, Land Use and Communities Technical Report Section 7.5, and Supplementals section of Connect SoCal main book. For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-2 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001706.09	5. Update and add the data usage language’s short-form paragraph provided by OCCOG to any maps or figures that contain or depict the growth forecast data—including TAZ-level maps—or development patterns.	Consistency language added to Demographics and Growth Forecast Technical Report Section 5.5, Land Use and Communities Technical Report Section 7.5, and Supplementals section of Connect SoCal main book.
0001706.10	6. Engage the Technical Working Group to assist in updating the style guide to be used in future RTP/SCS efforts to promote and enhance clarity.	SCAG is currently working to update an agency style guide that will inform the next Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG will engage with the Technical Working Group before finalizing this guide.

ID	COMMENT	RESPONSE
0001706.11	<p>7. Support OCCOG's matrix of comments on the Draft Connect SoCal 2024 (RTP/SCS) plan documents and Technical Reports.</p> <p>Again, we thank you for your time and consideration of the comments above. If you have any questions, please do not hesitate to contact me at [REDACTED].</p> <p>Sincerely,</p> <p>Deborah S. Diep Director, Center for Demographic Research</p> <p>Email CC: CDR Management Oversight Committee CDR Technical Advisory Committee OCCOG TAC Ad hoc review committee Kome Ajise, SCAG Sarah Jepsen, SCAG Rubaiya Zaman, CDR</p>	<p>Comment noted.</p> <p>For responses to the Orange County Council of Governments (OCCOG) comments, please see comment IDs: 0001766, 0001777, 0001778, 0001779, 0001780, 0001781 001782 0001783, 0001784, 0001785, 0001786, 0001787, 0001788, 0001798, 0001790, 0001791, 001792.</p>
Submitted by	Citizens Coalition for Safe Community, and Sierra Club transportation	Submittal 0001698

ID	COMMENT	RESPONSE
0001698.01	<p>Good afternoon. Dr. Tom Williams, Citizens Coalition for Safe Community, and Sierra Club transportation.</p> <p>A fundamental (question) is, when do we achieve Federal air quality compliance within the SCAG area? Totally.</p> <p>And then a second is, when do we achieve State air quality compliance within this SCAG area. So that that's fundamental - I have a lot of other questions that will be in writing to the SCAG.</p> <p>So, basic question is: we have a problem. It's not being solved. And you made no reference to air quality as to achieving the Federal and State requirements for air quality.</p> <p>They're on the books but we can't comply. So...when do we project to comply, by 2050? Question.</p> <p>That's all.</p>	<p>Pursuant to the federal Clean Air Act and the U.S. Environmental Protection Agency's Transportation Conformity Regulations, SCAG is required to demonstrate that its Connect SoCal (Regional Transportation Plan/Sustainable Communities Strategy or RTP/SCS) and Federal Transportation Program (FTIP) meet all federal transportation conformity requirements [CAA Section 176(c)]. The purpose of transportation conformity is to ensure that regional transportation plans, programs, and federally supported projects conform to or are consistent with the purpose of applicable air quality management plan (AQMP) or State Implementation Plan (SIP) for meeting the federal air quality standards. The five local air districts in the SCAG region develop and adopt their respective AQMPs/SIPs to identify and implement actions such as control strategies to attain and/or maintain the federal air quality standards within their respective jurisdiction.</p> <p>SCAG staff has performed the federal CAA-required transportation conformity analysis for Connect SoCal 2024. The analysis demonstrates positive transportation conformity by meeting all four CAA-required transportation conformity tests: 1) regional emissions analysis; 2) financial constraint test; 3) timely implementation of transportation control measures, and 4) interagency consultation and public involvement. For more information on federal transportation and air quality planning requirements, detailed transportation conformity analysis, and summary findings, refer to the Transportation Conformity Analysis Technical Report.</p> <p>Connect SoCal 2024's horizon year is 2050. The CAA-required regional emissions analysis must go out to the horizon year 2050. Utilizing the latest planning assumptions, including, but not limited to, a set of regional and countywide growth projections from 2019 to 2050 (Plan's horizon year), and the latest U.S. EPA-approved emissions model, the regional emissions analysis as discussed in Chapter 3 of the Transportation Conformity Analysis Technical Report demonstrates that Connect SoCal 2024's plan emissions do not exceed any applicable emission caps for all applicable criteria pollutants; for all applicable milestone, attainment, and planning horizon years; and in all nonattainment and maintenance areas within the SCAG region. Therefore, Connect SoCal 2024 complies with the applicable transportation conformity requirements, including the requirements on Plan's horizon year 2050.</p> <p>SCAG is also required by the California Health and Safety Code to develop and provide the socio-economic growth forecast and regional transportation demand model output data to the South Coast Air Quality Management District (AQMD) for use in estimating and forecasting emission inventories and air emission modeling, as well as write a portion of the AQMD's Air Quality Management Plan (AQMP) on the RTP/SCS and Transportation Control Measures (TCMs) as they relate to the region's air quality (commonly referred to as "Appendix IV-C" of the AQMP).</p> <p>Upon anticipated adoption by the SCAG's Regional Council in April 2024, the socio-economic growth forecast and regional transportation demand model output data of the Final Connect SoCal 2024 will be provided to the South Coast AQMD for developing its subsequent AQMP(s) to attain applicable federal and state ambient air quality standards. SCAG will also prepare the Appendix IV-C of the AQMP(s) based on the adopted Connect SoCal 2024 as appropriate.</p>
Submitted by	Citizens Coalition for Safe Community, and Sierra Club transportation	Submittal 0001700
0001700.01	<p>You haven't mentioned anything about the programmatic EIR.</p> <p>When is it due? And from what I understand, it's due at in the same timeframe as our comments. So, I'm looking at that. No problem</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
Submitted by	City of Anaheim	Submittal 0001772

ID	COMMENT	RESPONSE
0001772.01	<p>The City of Anaheim has completed its review of the Draft Connect SoCal 2024 RTP/SCS, PEIR, and related technical reports.</p> <p>The City of Anaheim concurs with the comments and recommendations submitted by the Orange County Council of Governments, Orange County Transportation Authority, and Center for Demographic Research on the Draft Connect SoCal 2024 RTP/SCS, PEIR, and related technical reports.</p> <p>The City of Anaheim also offers the following comments. Please note that comments, once identified, should be applied to all subsequent documents, appendices, and exhibits, as applicable.</p>	<p>Comment noted.</p> <p>For responses to the Orange County Council of Governments (OCCOG) comments, please see comment IDs: 0001766, 0001777, 0001778, 0001779, 0001780, 0001781 001782 0001783, 0001784, 0001785, 0001786, 0001787, 0001788, 0001798, 0001790, 0001791, 001792.</p> <p>For responses to the Orange County Transportation Authority (OCTA) comments, please see comment IDs: 0001668, 0001733 0001760, 0001767, 0001768 0001770, 0001771.</p> <p>For responses to Center for Demographic Research (CDR) comments, please see comment ID: 0001706</p>
0001772.02	<p>1. Project List Technical Report Page 254, RTP ID 2T04128 The project description states "construct overcrossing and SR-91 Interchange at Fairmont Boulevard". This project description was revised in OCTA's latest long range transportation plan (LRTP). The description should be consistent with OCTA's LRTP which states: "Add SR-91 Fairmont Boulevard interchange overcrossing to the north".</p> <p>2. Project List Technical Report Page 476, RTP ID 82120056 The project description states "construct grade separated intersection at Harbor Boulevard and Ball Road". This project description was revised in OCTA's latest LRTP. The description should be consistent with OCTA's LRTP which states: "Pedestrian Bridge Improvement in the Anaheim Resort".</p> <p>3. Project List Technical Report Page 478 Consistent with OCTA's latest LRTP, please add an unconstrained transit project, connecting the ARTIC and areas of high employment and travel demand.</p>	<p>Comment noted. We have addressed all modification requests to the Project List Technical Report as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. Your comment will be available for the Orange County Transportation Authority's (OCTA) review. SCAG will continue to work with OCTA on updates to the Project List as needed.</p>
0001772.03	<p>4. Mobility Technical Report - High Quality Transit Corridors, Pages 52-53 Please provide link(s) to the location on the SCAG website where all High-Quality Transit Corridor routes and Major Transit Stop locations for both Maps 2-3 and 2-4 can be viewed at the jurisdiction level.</p>	<p>SCAG is currently working on an interactive map for the High Quality Transit Corridors (HQTCS), including layers of the Major Transit Stops. The web map is anticipated to be available by Spring 2024. SCAG maps and data depicting HQTCS and major transit stops are intended for planning purposes only. Transit agencies make adjustments to bus services on a regular basis, and transit planning studies may be completed by transit agencies on a more frequent basis than Connect SoCal is updated by SCAG. Local jurisdictions should consult with the appropriate transit provider (s) to obtain the latest information on existing and planned transit routes, stop locations, and service intervals before making determinations regarding CEQA exemption or streamlining. It is the responsibility of the lead agency under CEQA to determine if a project meets statutory requirements.</p>
Submitted by	City of Eastvale	Submittal 0001714

ID	COMMENT	RESPONSE
0001714.01	<p>The City of Eastvale appreciates the opportunity to review and comment on the SCAG Draft Connect SoCal 2024. The City supports the plan's vision for "a healthy, prosperous, accessible and connected region for a more resilient and equitable future" and the goal to "support a sustainable, efficient, and productive regional economic environment that provides opportunities for all residents."</p> <p>Please see the attached letter for the City's comments on the document.</p>	Comment noted.
0001714.02	<p>January 12, 2024</p> <p>Connect SoCal Team Southern California Association of Governments 900 Wilshire Blvd., Ste. 1700 Los Angeles, CA 90017</p> <p>RE: CONNECT SOCAL 2024 DRAFT</p> <p>Dear Connect SoCal Team,</p> <p>The City of Eastvale appreciates the opportunity to review and comment on the SCAG Draft Connect SoCal 2024. The City supports the plan's vision for "a healthy, prosperous, accessible and connected region for a more resilient and equitable future" and the goal to "support a sustainable, efficient, and productive regional economic environment that provides opportunities for all residents." Although the plan is a snapshot in time, the included growth projections, targets, and goals will influence development throughout Southern California and inform other efforts, such as the Regional Housing Needs Assessment (RHNA) allocation.</p>	Comment noted.

ID	COMMENT	RESPONSE
0001714.03	<p>The City of Eastvale recognizes the tremendous effort that went into developing the Draft Connect SoCal and the challenge of coordinating with the 197 jurisdictions within the SCAG region and appreciates the opportunity to provide local input in late 2022. At the time of this input period, the City had recently adopted its Sixth Cycle Housing Element in April 2022 and received certification from the California Department of Housing and Community Development (HCD) on June 21, 2022. The Housing Element identifies adequate sites to accommodate the Regional Housing Needs Assessment target of 3,028 dwelling units, despite the fact that the City is over 90% built out.</p> <p>Since the close of the Connect SoCal input period, the City of Eastvale successfully completed the remainder of the 2040 General Plan, building off the goals and strategies developed during the Housing Element process. The Draft General Plan 2040 and the accompanying Draft Environmental Impact Report were released for public review on October 31, 2023. It is anticipated that the Draft General Plan 2040 and DEIR will be considered by the Planning Commission in February, 2024 and City Council in March, 2024. These documents can be reviewed here: https://www.eastvaleca.gov/our-city/what-s-new/eastvale-2040.</p> <p>Although it is recognized that the 2024 Connect SoCal plan is meant to represent a point in time, the City requests that any future growth projections, assumptions, or housing allocations prepared by SCAG as a result of the plan take into account the most up-to-date General Plan land use designations, environmental constraints, and existing developments within Eastvale.</p>	<p>Comment noted. Connect SoCal's growth forecast is reflective of information available during plan development, with input from local jurisdictions having been due in December 2022. We appreciate Eastvale's participation in the Local Data Exchange process for Connect SoCal 2024 and look forward to integrating subsequent changes, such as general plan updates, new developments, and other factors during the development of Connect SoCal 2028.</p>
0001714.04	<p>The City of Eastvale looks forward to continued collaboration with SCAG and our neighboring jurisdictions to work towards the goals of the 2024 Connect SoCal plan. Should you have any questions regarding this letter, or if we can be of assistance, please contact David Murray, City Planner at dmurray@eastvaleca.gov or (951) 703-4444.</p> <p>Sincerely,</p> <p>Mark Orme, ICMA-CM</p> <p>City Manager</p>	<p>Comment noted.</p>
Submitted by	City of Huntington Beach	Submittal 0001761
0001761.01.1	<p>Thank you for the opportunity to submit comments on the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal 2024 or the Plan) and the associated Program Environmental Impact Report (PEIR).</p>	<p>Comment noted.</p>
0001761.01.2	<p>The City of Huntington Beach (the City) appreciates the Southern California Association of Governments' (SCAG) public outreach efforts for this process and offers the following comments and concerns for your consideration and response</p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001761.02.1	<p>Priority Development Areas (PDAs)</p> <p>The City of Huntington Beach recognizes the alignment of SCAG’s Regional Housing Needs Assessment (RHNA) and RTP/SCS documents are required by Government Code Section 65080(b) (2)(B) and Section 65584.04(m), however, we do not agree with the use of Priority Development Areas (PDAs), such as Neighborhood Mobility Areas (NMAs) and Transportation Priority Areas (TPAs), for future purposes related to the RHNA methodology. Notably, the Plan and its appendices states that local jurisdictions were tasked with reviewing the PDAs and NMAs. However, this statement is false and misleading to the SCAG Regional Council. SCAG’s Data Map Books inform member jurisdictions that reviewing the NMAs is an optional task. This continues a pattern of SCAG communicating to its governing bodies and the public that local jurisdictions were explicitly “tasked with” and “vetted” the PDAs and NMAs. The City of Huntington Beach hereby reincorporates and restates its comments regarding the inadequacy of the 2022 Data Map Books that were utilized to inform the 2024 Connect SoCal Plan and PEIR in its letter dated December 1, 2022.</p>	<p>Comment noted. Priority Development Areas (PDAs) are areas within the SCAG region where future growth can be located in order to help the region reach Plan goals. While the descriptions and data inputs of PDAs generally reflect the principles and targets of Connect SoCal, they are non-binding growth visioning tools. Additionally, they were utilized to assist in developing the preliminary growth forecasts, which were then reviewed and edited by local jurisdictions, including Huntington Beach, during the Local Data Exchange (LDX) which took place between May 2022 and December 2022.</p> <p>Jurisdictions were also given the option to provide feedback during this time to modify SCAG’s records for priority development areas boundaries; however, following their use as a growth visioning tool, the TAZ-level household and employment growth forecast data for Huntington Beach and other jurisdictions became the sole reflection of anticipated growth in Connect SoCal. As such, and since SCAG is not able to compel participation in LDX, the input process emphasized the higher importance of reviewing growth forecast data as compared to PDA boundaries. Nonetheless LDX provided an equal and ample opportunity for all jurisdictions to review and edit PDAs. All edits made by local jurisdictions, including Huntington Beach, to growth forecast data and PDA boundaries were integrated into Connect SoCal 2024 data.</p> <p>The RHNA allocation methodology process for the 7th cycle RHNA has not yet begun, at that time the Regional Council will set forth a process to identify any data or strategies to be incorporated.</p>
0001761.02.2	<p>Furthermore, we do not agree that local jurisdictions should be held to these PDAs, as development patterns within a city are subject to change, and such project areas depicted in the Plan and PEIR may not be viable for future development, which, according to the Plan, may involve right-of-way (ROW) acquisition and the potential for displacement of homes and businesses. Further analysis in the Final EIR should be conducted to fully understand the impacts of PDAs. Additionally, Map 2-9 in the PEIR is difficult to read and does not clearly identify the areas that may be impacted by PDAs. The City of Huntington Beach requests that inset maps of each county be included to adequately review the PEIR’s PDA locations.</p>	<p>Comment noted. Priority Development Areas (PDAs) are areas within the SCAG region where future growth can be located in order to help the region reach Plan goals. While the descriptions and data inputs of PDAs generally reflect the principles and targets of Connect SoCal, they are non-binding growth visioning tools. Additionally, they were utilized to assist in developing the preliminary growth forecasts, which were then reviewed by local jurisdictions, including Huntington Beach, during the Local Data Exchange which took place between May 2022 and December 2022. Feedback was accepted during this time to modify SCAG’s records for priority development areas boundaries; however, following their use as a growth visioning tool, the TAZ-level household and employment growth forecast data for Huntington Beach and other jurisdictions became the sole reflection of anticipated growth in Connect SoCal. Individual maps for each Priority Development Area (Livable Corridors, Neighborhood Mobility Areas, Transit Priority Areas, and Spheres of Influence) at the jurisdictional level can be found in the revised Data Map Books from November 2023 hosted on SCAG’s Local Data Exchange website.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter LOC-3 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001761.03	<p>Green Region Resource Area (GRRAs)</p> <p>According to the draft Plan, projects that fall within GRRAs often must take actions to address environmental impacts, areas with multiple convergences of GRRAs topic areas will likely be more costly to develop due to more intense legal requirements. Therefore, SCAG's approach of de-emphasizing growth in areas with the highest number of convergences is sensitive to market considerations. Further, the preservation and restoration of GRRAs can reduce risks from climate change and promote future resilience in the region. Map 2-10 in the PEIR depicts GRRAs within the SCAG region, however, it is difficult to read. Considering the City is impacted by topic areas such as FEMA flood zones, coastal inundation, and sensitive habitat areas, it is necessary for inset maps of each county be included to adequately review GRRAs. In addition, we request analysis and maps specifically for SCAG areas with overlapping PDAs and GRRAs. This additional information will allow us to properly evaluate the Plan and provide adequate feedback.</p>	<p>As part of the Local Data Exchange (LDX) detailed in Section 5 of the Land Use and Communities Technical Report, SCAG met one-on-one with jurisdictions to review the Priority Development Areas (PDAs) and Green Region Resource Areas (GRRAs) data elements both in the PDF Data/Map Book as well as through an interactive web mapping application from SCAG's Regional Data Platform. This application allows data to be viewed at local, county, and regional scales, and also provides the functionality to export maps at the user's desired scale. Individual maps for each PDA (Livable Corridors, Neighborhood Mobility Areas, Transit Priority Areas, and Spheres of Influence) and GRRAs at the jurisdictional level can be found in the revised Data/Map Books from November 2023, which are hosted on SCAG's Local Data Exchange website.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter LOC-3 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001761.04	<p>Coastal Issues</p> <p>Through its various administrative agencies, the State of California has declared that the impact of sea level rise and planning for coastal inundation is of great concern. The State's Ocean Protection Council (OPC) adopted its first sea level rise guidance document in March 2013. The California Coastal Commission (CCC) has adopted multiple guidance documents since 2015 regarding climate change, sea level rise, and coastal inundation utilizing the best available data. At their May 13, 2020 meeting, the CCC adopted a document titled, "Making California's Coast Resilient to Sea Level Rise: Principles for Aligned State Action." CCC said that the document is a tool for aligned, consistent state agency action in planning and preparing for a minimum baseline 3.5 feet of sea level rise statewide. The principles outlined in the document are intended to guide unified, effective action towards sea level rise resilience for California's coastal communities, ecosystems, and economies across state agencies in order to improve effectiveness in addressing this immediate challenge.</p> <p>Despite the declaration by State agencies concerning sea level rise, it is notable that the OPC and the CCC have not been engaged in the public review process. The CCC and the OPC are key stakeholders for jurisdictions in the coastal zone across the State Development proposals in the coastal zone are subject to final approval of the CCC even if the jurisdiction has a certified Local Coastal Program. The CCC has the ability to appeal a City's approval of any project within the coastal zone and conduct their own review of the project, which may ultimately result in project disapproval beyond control of the City. Potential rezoning and associated land use changes required to adequately plan for any RHNA methodology allocations will necessitate a Local Coastal Program Amendment for all jurisdictions with certified Local Coastal Programs. Coastal jurisdictions may adopt land use changes to align with the Connect SoCal plan, but there is no guarantee that those changes will be approved by the CCC.</p>	<p>Comment noted. Huntington Beach provided Connect SoCal Growth forecast input to SCAG which was fully integrated into the plan for 2019, 2035, and 2050 total households and total employment at the Transportation Analysis Zone (TAZ)-level. As described in Section 4.6 of the Demographics & Growth Forecast Technical Report, "it is not expected or required that every jurisdiction's household forecast match or exceed their 6th cycle RHNA allocation, as this involves many factors. However, the expectation during the LDX and the Connect SoCal 2024 plan development process is that SCAG and local jurisdictions account for the increase in available sites resulting from RHNA into account when developing the growth forecast.</p> <p>Section 5.3 in the Land Use and Communities Technical Report includes descriptions of climate hazard data within Green Region Resource Areas that were considered in the development of Connect SoCal's Forecasted Regional Development Pattern, which was developed local jurisdiction's feedback on anticipated future growth through the Local Data Exchange (LDX). For coastal inundation, SCAG utilized one meter (3.28 feet) projections from the Coastal Storm Modeling System (CoSMoS) for Southern California (v3.0, Phase 2), as developed by the US Geological Survey, to help inform local jurisdictions' input on the Forecasted Regional Development Pattern. This data is identified to be a resource tailored to conditions in Southern California, and is included as a data source in the California Coastal Commission's "Sea Level Rise Policy Guidance: Interpretive Guidelines for Addressing Sea Level Rise in Local Coastal Programs and Coastal Development Patterns" of 2018. This document also references the Ocean Protection Council's 2018 Sea-Level Rise Guidance as a source of best available science to determine the projected sea level rise range for a proposed project. Within that document, guidance indicates the low risk aversion projection ranges from 2.4 to 3.4 feet of sea level rise for projects with a lifespan beyond 2050, which is reflective of Representative Concentration Pathway (RCP) 2.6 on the low end and RCP 8.5 on the high end.</p> <p>More recent guidance from the California Coastal Commission indicates that a projected 3.5 feet of sea level rise ought to be considered for year 2050 for transportation and water infrastructure projects. Updated guidance will be factored into the Connect SoCal 2028 plan, and SCAG will continue to work with jurisdictions and transportation commissions to support climate adaptation planning to reduce the impacts of sea level rise. This is consistent with the Connect SoCal regional planning policy to "Support local and regional climate and hazard planning and implementation efforts" and the implementation strategy to "Provide local and regional partners with resources, education and trainings to identify and protect areas vulnerable to climate effects and other resilience shocks and stressors, particularly for low-income communities and communities of color". Importantly, Connect SoCal 2024 does not supersede local land use authority, as outlined in SB 375.</p> <p>SCAG's Regional Council will develop, review, and approve methodologies and all other processes related to the 7th cycle of RHNA beginning in approximately 2026 based on legislation and guidelines in effect at that time.</p>

ID	COMMENT	RESPONSE
0001761.05.1	SCAG's Connect SoCal has not addressed the impact of sea level rise (SLR), coastal inundation, and other coastal issues or the ability of coastal jurisdictions to plan for their RHNA.	<p>Comment noted. Huntington Beach provided Connect SoCal Growth forecast input to SCAG which was fully integrated into the plan for 2019, 2035, and 2050 total households and total employment at the Transportation Analysis Zone (TAZ)-level. As described in Section 4.6 of the Demographics & Growth Forecast Technical Report, "it is not expected or required that every jurisdiction's household forecast match or exceed their 6th cycle RHNA allocation, as this involves many factors. However, the expectation during the LDX and the Connect SoCal 2024 plan development process is that SCAG and local jurisdictions account for the increase in available sites resulting from RHNA into account when developing the growth forecast.</p> <p>Section 5.3 in the Land Use and Communities Technical Report includes descriptions of climate hazard data within Green Region Resource Areas that were considered in the development of Connect SoCal's Forecasted Regional Development Pattern, which was developed local jurisdiction's feedback on anticipated future growth through the Local Data Exchange (LDX). For coastal inundation, SCAG utilized one meter (3.28 feet) projections from the Coastal Storm Modeling System (CoSMoS) for Southern California (v3.0, Phase 2), as developed by the US Geological Survey, to help inform local jurisdictions' input on the Forecasted Regional Development Pattern. This data is identified to be a resource tailored to conditions in Southern California, and is included as a data source in the California Coastal Commission's "Sea Level Rise Policy Guidance: Interpretive Guidelines for Addressing Sea Level Rise in Local Coastal Programs and Coastal Development Patterns" of 2018. This document also references the Ocean Protection Council's 2018 Sea-Level Rise Guidance as a source of best available science to determine the projected sea level rise range for a proposed project. Within that document, guidance indicates the low risk aversion projection ranges from 2.4 to 3.4 feet of sea level rise for projects with a lifespan beyond 2050, which is reflective of Representative Concentration Pathway (RCP) 2.6 on the low end and RCP 8.5 on the high end. More recent guidance from the California Coastal Commission indicates that a projected 3.5 feet of sea level rise ought to be considered for year 2050 for transportation and water infrastructure projects. Updated guidance will be factored into the Connect SoCal 2028 plan, and SCAG will continue to work with jurisdictions and transportation commissions to support climate adaptation planning to reduce the impacts of sea level rise. This is consistent with the Connect SoCal regional planning policy to "Support local and regional climate and hazard planning and implementation efforts" and the implementation strategy to "Provide local and regional partners with resources, education and trainings to identify and protect areas vulnerable to climate effects and other resilience shocks and stressors, particularly for low-income communities and communities of color". Importantly, Connect SoCal 2024 does not supersede local land use authority, as outlined in SB 375.</p> <p>SCAG Regional Council will develop, review, and approve methodologies and all other processes related to the 7th cycle of RHNA beginning in approximately 2026 based on legislation and guidelines in effect at that time.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter LOC-3 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001761.05.2	<p>SCAG's 2022 RTP Data Map Book for Huntington Beach includes an exhibit depicting "Coastal Inundation (Sea Level Rise) in Orange County." Nearly all of the lowest lying land in Orange County is within Huntington Beach and its annexation of Sunset Beach; a small portion affects Newport Beach and Seal Beach. The data from the Map Book does not utilize the best available science/data as the State has since revised SLR analysis to plan for a baseline of 3.5 feet of SLR statewide and the map only depicts 1 meter of SLR (3.28 ft.). It must also be noted that the Map Book contains these exhibits and information regarding SLR but SCAG does not utilize them for any analysis within Connect SoCal.</p> <p>SCAG fails to address this critical information from the CCC. Coastal cities are explicitly unable to accommodate any new development (especially residential development) in the Coastal Zone and adjacent areas, as it is specifically vulnerable and unable to adapt to managed retreat within areas of sea level rise. The CCC expects all LCPs to recognize that public lands adjacent to the Pacific Ocean and harbors will extend inward as a direct result of sea level rise. This information alone indicates that coastal cities will lose land available for development (and land that is currently developed) to the public trust boundary. The CCC also recommends that coastal cities purchase land within areas of sea level rise to remove all associated structures and conserve the land as open space.</p>	<p>Comment noted. Section 5.3 in the Land Use and Communities Technical Report includes descriptions of climate hazard data within Green Region Resource Areas that were considered in the development of Connect SoCal's Forecasted Regional Development Pattern, which was developed local jurisdiction's feedback on anticipated future growth through the Local Data Exchange (LDX). For coastal inundation, SCAG utilized one meter (3.28 feet) projections from the Coastal Storm Modeling System (CoSMoS) for Southern California (v3.0, Phase 2), as developed by the US Geological Survey, to help inform local jurisdictions' input on the Forecasted Regional Development Pattern. This data is identified to be a resource tailored to conditions in Southern California, and is included as a data source in the California Coastal Commission's "Sea Level Rise Policy Guidance: Interpretive Guidelines for Addressing Sea Level Rise in Local Coastal Programs and Coastal Development Patterns" of 2018. This document also references the Ocean Protection Council's 2018 Sea-Level Rise Guidance as a source of best available science to determine the projected sea level rise range for a proposed project. Within that document, guidance indicates the low risk aversion projection ranges from 2.4 to 3.4 feet of sea level rise for projects with a lifespan beyond 2050, which is reflective of Representative Concentration Pathway (RCP) 2.6 on the low end and RCP 8.5 on the high end.</p> <p>More recent guidance from the California Coastal Commission indicates that a projected 3.5 feet of sea level rise ought to be considered for year 2050 for transportation and water infrastructure projects. Updated guidance will be factored into the Connect SoCal 2028 plan, and SCAG will continue to work with jurisdictions and transportation commissions to support climate adaptation planning to reduce the impacts of sea level rise. This is consistent with the Connect SoCal regional planning policy to "Support local and regional climate and hazard planning and implementation efforts" and the implementation strategy to "Provide local and regional partners with resources, education and trainings to identify and protect areas vulnerable to climate effects and other resilience shocks and stressors, particularly for low-income communities and communities of color". Importantly, Connect SoCal 2024 does not supersede local land use authority, as outlined in SB 375.</p>
0001761.05.3	<p>In the past, Connect SoCal, including the associated PEIR, characterized coastal cities resistant to new development due to "community resistance to new housing, especially medium and high density projects." Although the PEIR now lists general background information and the requirements imposed on coastal cities by the Coastal Act and the Coastal Commission, it does not use this information in any of the impact analyses. The development challenges faced by coastal cities due to sea level rise appear to be completely ignored by PEIR and replaced with the politics from other areas of the SCAG region to keep RHNA numbers and housing out of their jurisdictions.</p>	<p>Comment noted. Huntington Beach provided Connect SoCal Growth forecast input to SCAG which was fully integrated into the plan for 2019, 2035, and 2050 total households and total employment at the Transportation Analysis Zone (TAZ)-level. As described in Section 4.6 of the Demographics & Growth Forecast Technical Report, "it is not expected or required that every jurisdiction's household forecast match or exceed their 6th cycle RHNA allocation, as this involves many factors. However, the expectation during the LDX and the Connect SoCal 2024 plan development process is that SCAG and local jurisdictions account for the increase in available sites resulting from RHNA into account when developing the growth forecast."</p> <p>SCAG Regional Council will develop, review, and approve methodologies and all other processes related to the 7th cycle of RHNA beginning in approximately 2026 based on legislation and guidelines in effect at that time.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter LOC-3 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001761.06	<p>It now appears the PEIR is extending this generalization to the SCAG region as cause of the housing crisis. It appears that SCAG purposefully does not acknowledge any relevant information regarding the significant negative environmental impacts and CCC policies on development other than protected open space within areas subject to sea level rise, including SCAG's own Data Map Book exhibits produced in 2017. Excluding this pertinent analysis from the RHNA and RTP/SCS process enables Connect SoCal and RHNA to Page 4 of 5 arbitrarily and capriciously achieve Governor Newsom's admitted "stretch goal" to construct 3.5 million units in California by 2025.</p> <p>All lands within the state of California that are subject to sea level rise, including those within the SCAG region such as Huntington Beach, must be removed from the model scenarios in both the Plan and the PEIR, and subsequently excluded from any RHNA calculation (including but not limited to job accessibility, HQT proximity, reallocated residual need, and additional social equity adjustments) in order for Connect SoCal and RHNA to be consistent (Government Code Section 65080(b)(2)(B) and Section 65584.04(m)).</p>	<p>Comment noted. SCAG provided a number of environmental layers within each jurisdiction's Data/Map Book to help inform local feedback to the Connect SoCal Growth Forecast, which are detailed in Section 5 of the Land Use and Communities Technical Report. These include sea level rise, protected open space, habitat areas, wildfire hazard zones, wildland urban interface, flood hazard zones, farmland, military lands, tribal nation lands, NCCP/HCPs, rare/threatened/endangered species and plants. Huntington Beach provided Connect SoCal Growth Forecast input to SCAG which was fully integrated into the plan for 2019, 2035, and 2050 total households and total employment at the Transportation Analysis Zone (TAZ)-level. As described in Section 4.6 of the Demographics & Growth Forecast Technical Report, "it is not expected or required that every jurisdiction's household forecast match or exceed their 6th cycle RHNA allocation, as this involves many factors. However, the expectation during the LDX and the Connect SoCal 2024 plan development process is that SCAG and local jurisdictions account for the increase in available sites resulting from RHNA into account when developing the growth forecast." Importantly, Connect SoCal 2024 does not supersede local land use authority, as outlined in SB 375.</p> <p>SCAG Regional Council will develop, review, and approve methodologies and all other processes related to the 7th cycle of RHNA beginning in approximately 2026 based on legislation and guidelines in effect at that time.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter LOC-3 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001761.07	<p>Project List</p> <p>The Plan includes a Project List of funded projects within the SCAG region; however, many projects listed within the Draft Connect SoCal Project List are not descriptive enough to understand or verify information. To properly evaluate the Plan and provide adequate feedback, the project list should be updated to be descriptive enough to understand what the project entails. As stated in Chapter 3 of the Plan, the projects listed are regionally significant to meet the needs and goals of each county, therefore, transparency of these projects is important to ensure that these needs and goals are being met. Please provide the aforementioned information for the following projects:</p> <ol style="list-style-type: none"> 1. Digital Bus Stop Signs/Electronic Message Signs Along High-Quality Transit Corridors (FTIP ID: ORA219901) 2. Group Projects for Planning and Technical Studies (FTIP ID: ORA171901) 3. Transit Service Expansion Planning (FTIP ID: ORA230504) 4. Orange County – Countywide Activities: Planning, Programming, and Monitoring (FTIP ID: ORA040607) 5. Microtransit Service Expansion (Capital) (FTIP ID: 324T010) 6. Microtransit Service Expansion (O&M) (FTIP ID: 324T011) 7. OC Transit – Corridor Improvements (FTIP ID: 2200T001) 8. OC Mobility Hubs Network (FTIP ID: 324T012) 	<p>Comment noted. The Project List Technical Report includes general scope and schedule information to describe projects for long-range planning purposes. To review more detailed information for projects that have advanced beyond planning and are programmed with funding, you can refer to the FTIP website where you can search all the programmed short-range plan projects by ID. Following is the website link: https://scag.ecointeractive.com/</p>

ID	COMMENT	RESPONSE
0001761.08	<p>Support for Comments and Recommendations Submitted by Other Groups</p> <p>The City of Huntington Beach expresses support for comments made by the Center for Demographic Research (CDR) and the Orange County Council of Governments (OCCOG). The City would like to highlight the following comments from CDR and OCCOG that are of the highest level of concern:</p> <ol style="list-style-type: none"> 1.CDR RTP/SCS and OCCOG comments which revise text to maintain an objective/unbiased tone, delete sensationalized language, and include meaningful evidence to support generalized claims about the SCAG region. 2.OCCOG comments opposing any alternative in the PEIR that does not utilize local input, including the intensified land use alternative. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction submitted by jurisdictions should not be utilized as the preferred alternative. 3.OCCOG PEIR comments regarding the usage of "can and should" in mitigation measures. Revise all mitigation measures to be "considered where applicable and feasible" to clarify that these mitigation measures are a menu of options and not requirements. 4.CDR RTP/SCS and OCCOG comments which endorse the ongoing utilization of growth forecast data supplied by local jurisdictions in forthcoming Plan updates to ensure accurate representation of development agreements, entitlements, current and recent construction, open space, and general plan densities. 5.OCCOG's matrix of comments on the Draft Connect SoCal 2024 (RTP/SCS) plan documents and Technical Reports. 	<p>Comment noted.</p> <p>For responses to the Orange County Council of Governments (OCCOG) comments, please see comment IDs: 0001766, 0001777, 0001778, 0001779, 0001780, 0001781 001782 0001783, 0001784, 0001785, 0001786, 0001787, 0001788, 0001798, 0001790, 0001791, 001792.</p> <p>For responses to Center for Demographic Research (CDR) comments, please see comment ID: 0001706</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter LOC-3 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
Submitted by	City of Irvine	Submittal 0001721
0001721.01.1	<p>Please refer to the attached letter for comments from the City of Irvine.</p> <p>The City of Irvine appreciates the opportunity to review and provide comments on Connect SoCal, the Draft 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (2024 RTP/SCS) and the Draft Program Environmental Impact Report (PEIR). The draft 2024 RTP/SCS and PEIR is a significant effort the City of Irvine recognizes is critical to the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction targets and other air conformity standards.</p> <p>The following general comments and recommendations are offered by the City of Irvine on the 2024 RTP/SCS, associated appendices, and PEIR. In support of this letter, please find attached more specific detailed comments from the City of Irvine that are consistent with the comments provided by the Orange County Council of Governments (OCCOG) and the Center for Demographic Research (CDR) at California State University Fullerton.</p> <p>The City of Irvine requests that this letter and all of its attachments be included in the public record as our collective comments on the 2024 RTP/SCS, PEIR, all associated appendices and documents, and online inventory of maps.</p>	<p>Comment noted.</p> <p>For responses to the Orange County Council of Governments (OCCOG) comments, please see comment IDs: 0001766, 0001777, 0001778, 0001779, 0001780, 0001781 001782 0001783, 0001784, 0001785, 0001786, 0001787, 0001788, 0001798, 0001790, 0001791, 001792.</p> <p>For responses to Center for Demographic Research (CDR) comments, please see comment ID: 0001706</p>

ID	COMMENT	RESPONSE
0001721.01.2	<p>1. The City of Irvine concurs with the comments prepared by the Orange County Council of Governments (OCCOG) and the Center for Demographic Research (CDR) at California State University Fullerton. 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.</p>	<p>Comment noted.</p> <p>For responses to the Orange County Council of Governments (OCCOG) comments, please see comment IDs: 0001766, 0001777, 0001778, 0001779, 0001780, 0001781, 001782, 0001783, 0001784, 0001785, 0001786, 0001787, 0001788, 0001798, 0001790, 0001791, 001792.</p> <p>For responses to Center for Demographic Research (CDR) comments, please see comment ID: 0001706</p>
0001721.01.3	<p>2. Connect SoCal consistency determinations</p> <p>The City supports OCCOG's proposed Consistency Language which establishes limitations of the use of the growth forecast data and forecasted development pattern. The City also supports OCCOG's request to use the proposed language to replace the current applicable language in the Demographics and Growth Forecast Technical Report, and to incorporate the language to the main RTP/SCS document at the end of page 97, the Land Use and Communities Technical Report, and as a response to comments in the draft PEIR. The full text of the requested Consistency Language is included in Attachment 1 of OCCOG's letter.</p> <p>In addition, any maps or figures that contain or depict the growth forecast data, including TAZ-level maps or development patterns, need to have the following language embedded in the map or figure Insert data usage paragraph:</p> <p>"Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."</p>	<p>Disclaimer language added.</p> <p>For responses to the Orange County Council of Governments (OCCOG) comments, please see comment IDs: 0001766, 0001777, 0001778, 0001779, 0001780, 0001781, 001782, 0001783, 0001784, 0001785, 0001786, 0001787, 0001788, 0001798, 0001790, 0001791, 001792.</p>
0001721.02	<p>3. Priority Development Areas (PDAs)</p> <p>The City recognizes SCAG's movement away from High Quality Transit Areas (HQTAs) that were focus areas in the 2020 RTP/SCS and the 6th RHNA cycle to now focus on Priority Development Areas (PDAs) in the 2024 RTP/SCS. The City also recognizes the alignment of SCAG's Regional Housing Needs Assessment (RHNA) and RTP/SCS documents are required by Government Code Section 65080(b) (2)(B) and Section 65584.04(m); however, the City recommends extreme caution and requests close consultation with local jurisdictions for any use of PDAs, such as Neighborhood Mobility Areas and Transportation Priority Areas, identified in the RTP/SCS for future purposes related to the RHNA methodology and more. Further the City of Irvine strongly advises that local jurisdictions shall not be held to these PDAs, as development patterns within a city and/or county are subject to change and such locations identified in the RTP/SCS may not be viable for future development. Jurisdictions and the Technical Working Group should be consulted for any methodology to develop future RHNA allocations or in using PDA's for RHNA and/or other purposes.</p>	<p>Comment noted. Priority Development Areas (PDAs) are areas within the SCAG region where future growth can be located in order to help the region reach Plan goals. While the descriptions and data inputs of PDAs generally reflect the principles and targets of Connect SoCal, they are non-binding growth visioning tools. Additionally, they were utilized to assist in developing the preliminary growth forecasts, which were then reviewed by local jurisdictions, including Irvine, during the Local Data Exchange which took place between May 2022 and December 2022. Feedback was accepted during this time to modify SCAG's records for priority development areas boundaries; however, following their use as a growth visioning tool, the TAZ-level household and employment growth forecast data for Irvine and other jurisdictions became the sole reflection of anticipated growth in Connect SoCal. The RHNA allocation methodology process for the 7th cycle RHNA has not yet begun, at that time the Regional Council will set forth a process to identify any data or strategies to be incorporated.</p>

ID	COMMENT	RESPONSE
0001721.03	<p>4. Growth Forecast</p> <p>The City greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2024 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities. The City opposes any alternative in the PEIR that does not utilize local input provided through the local input/Local Data Exchange (LDX) process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction submitted by jurisdictions should not be utilized as the preferred alternative.</p> <p>We also want to express our appreciation for the LDX process during this iteration whereby SCAG folded in the growth visioning and policies into the initial draft growth forecast that was provided to local jurisdictions for review during the LDX process. The City along with OCCOG has staunchly advocated for this approach since the 2012 RTP/SCS development process. The inclusion of the local jurisdiction input submitted on housing and employment directly into the RTP/SCS—and unchanged— demonstrates the successful collaborative visioning along with accurately reflecting entitlements and local policies and plans. We urge SCAG to continue this same process in future iterations.</p>	<p>Comment noted.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter LOC-4 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001721.04	<p>5. Process Concerns</p> <p>We emphatically recommend the timeline for development of the RTP/SCS be revised in the 2028 cycle to allow for a more robust review process prior to the holidays—or even completion of the whole process before the holidays—which would ensure that comments being provided as part of the public comment period have the opportunity to be fully considered by SCAG staff and the policy committees, and stakeholders and jurisdictions have the opportunity to ensure that comments have been addressed, prior to asking the Regional Council to adopt the final plan. This has been a long-standing concern since the 2012 RTP/SCS iteration where each Plan has been released near the holidays and the public comment period has covered holidays and closures that often make it difficult to find ample time for thorough technical review of the hundreds of pages of documents before comments are provided to governing boards for consideration to submit as official public comment.</p>	<p>Comment noted. SCAG recognizes that stakeholders have requested additional time for the draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) public review and comment period and to avoid the end of year holiday period. SCAG must balance a potential earlier release window with the risk of needing to make a larger amount of RTP project changes post-comment period which could delay Plan adoption and lead to a lapse in SCAG's federal transportation conformity determination.</p>

ID	COMMENT	RESPONSE
0001721.05	<p>6. Remain Neutral on Technology</p> <p>Throughout the documents, there are specific examples of technology identified. It is not SCAG's purview to pick winners and losers in technology; the marketplace will determine dominant technologies. Therefore, it should be noted that these are only examples and that future technologies should not be ignored or excluded from meeting the goals of the RTP/SCS. This will allow the document, including mitigation measures, to be more inclusive of and responsive to changing technological advances.</p> <p>Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation but avoid naming specific technologies or providers (example "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").</p>	<p>Comment Noted. Connect SoCal 2024 was crafted in accordance with SCAG's Clean Transportation Technology Policy, as outlined in Resolution No.23-654-5, adopted by the Regional Council. This resolution establishes a framework for assessing zero or near-zero emission transportation systems, emphasizing technology neutrality. The policy is referenced in Chapter 2: Our Region Today, specifically on Page 63. There may be instances where reference to specific technologies such as electric vehicles are necessary for the particular context, including when describing a specific program or strategy.</p> <p>Moreover, SCAG has compiled a Clean Technology Compendium. This resource offers staff and decision-makers a selection of feasible clean technologies for potential implementation within their local jurisdictions. The Compendium is referenced also in Chapter 2: Our Region Today, page 63, and served as a foundational document for data collections, analysis and research.</p> <p>SCAG does utilize the term TNC, which is defined in the Glossary. As this term may not be relatable to the reader who doesn't use the term in their day-to-day lives, SCAG references Uber or Lyft as recognizable examples of TNCs.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter LOC-4 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001721.06	<p>7. Maintain Unbiased, Objective Tone</p> <p>Language throughout the draft Connect SoCal Plan and PEIR and the associated technical reports and appendices tends to be in first-person tone, leading, and dramatic in its emphasis of certain key issues, such as housing, equity, and land use policy. While these issues are important, using opinion based and emotionally charged language is inappropriate in this context.</p> <p>Recommendation: SCAG should remove, wherever applicable, opinion and descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region.</p>	<p>Comment noted. SCAG's use of first-person tone was in some cases used to make the material more readable to a general public audience reader. Text is updated where feasible to reduce the use of language like "our" to present a more objective tone.</p>

ID	COMMENT	RESPONSE
0001721.07	<p>8. "Can and Should"</p> <p>As indicated in the PEIR, state law provides that it is appropriate to indicate in mitigation measures that they "can and should" be implemented where the authority to implement the measures rest with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies' regulatory measures. The City recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, The City deems any language seemingly imposing affirmative obligations contrary to SB 375 inappropriate. As such, the use of the language "can and should" for mitigation measures addressed to local agencies is overreaching. SCAG should therefore add the following qualifier subsequent to each use of "can and should": "where applicable and feasible".</p> <p>Recommendation: Ensure consistent language in each project-level mitigation measure by adding "where applicable and feasible." This change will clarify that the project-level mitigation measures are a menu of options.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter LOC 3 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001721.08	<p>9. Duplicative/Existing Regulations</p> <p>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 to reduce or avoid impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact, and the significance of the impact should be looked at after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If SCAG opts not to remove mitigation measures that restate existing regulation, then the City requests that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken.</p> <p>Recommendation: The City proposes the use of: "Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations," and acknowledges SCAG has already included similar language in some mitigation measures.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter LOC-4 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001721.09	<p>10. Provide Sources for All Graphics and Tables</p> <p>When a report of such complexity as the Connect SoCal Plan is produced, it is common for tables, maps, and other graphics to be used or referred to in a manner that could divorce them from the context in which they are presented. For instance, someone may come upon a chart that explains a topic they are researching and could download the image separate and apart from the technical explanation accompanying it in the electronic version of the document. Without original source information embedded in the graphic, information can be spread without proper attribution. We understand that it may “look cleaner” to not include a source, date, and citation for data but best practices for technical reports include adding sources to all graphics. In addition, citing another SCAG report as the source instead of the original data source should be avoided.</p> <p>Recommendation: Make it a SCAG style guide policy to include the original source and date of all data used in tables, charts, maps, infographics etc. included in all Connect SoCal-related documents. All related documents should also be branded with “Connect SoCal 2024” to differentiate from past and future iterations.</p>	<p>Comment noted. Maps, figures and tables are updated, where feasible.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter LOC-4 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001721.10	<p>11. Project List</p> <p>The “OC Maintenance Facility” identified on page 105 of the Connect SoCal Plan Project List is located within the City of Irvine and is subject to the approval of a Conditional Use Permit.</p> <p>Recommendation: Add the following footnote to the “OC Maintenance Facility” identified on page 105 of the Connect SoCal Plan Project List: “The OC Maintenance Facility is subject to the approval of a Conditional Use Permit from the City of Irvine.”</p>	<p>Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. Please work with the Orange County Transportation Authority to amend the project if necessary.</p>
0001721.11	<p>The City of Irvine appreciates your consideration of all comments provided in this letter and enclosure and looks forward to your responses. It is a shared goal to have a Regional Transportation Plan and Sustainable Communities Strategy adopted by the April 2024 deadline that represents the best in regional planning developed collaboratively with local jurisdictions and stakeholders in a manner that is credible and defensible on all levels</p>	<p>Comment noted.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter LOC-4 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
Submitted by	City of La Habra	Submittal 0001674
0001674.01	<p>On maps throughout the document, Imperial Highway, Whittier Boulevard and Beach Boulevard are shown as freeways within the City of La Habra. While these are Caltrans facilities, they do not meet the Caltrans definition of a freeway. Please verify that this is a mapping error, and not also a modeling error, and correct as needed. Please also add a definition for “Freeway” to the Glossary.</p>	<p>SCAG has confirmed that these Caltrans facilities through La Habra are not modeled as freeways. As applicable, SCAG is updating maps to improve accuracy.</p>
0001674.02	<p>Throughout the document, the terms “roll” and “rolling” are used in reference to a type of transportation. Please define these terms in the Glossary.</p>	<p>The glossary is updated to include this term.</p>
0001674.03	<p>Please define the term “15-minute communities” in the Glossary and indicate whether the analysis of these communities includes whether the employees for the amenities are able to afford housing within the 15-minute threshold for these communities.</p>	<p>Comment noted. 15-minute communities are outlined in greater detail in Section 6.3.2 of the Land Use and Communities Technical Report and are defined as places in which you can access all of your basic, day-to-day needs, services and amenities within a 15-minute walk, bike or roll from your home or as places that result in fewer and shorter trips because of the proximity of complementary land uses. This is where people are able to make fewer and/or shorter trips due to the proximity of activity centers and destinations.</p>

ID	COMMENT	RESPONSE
0001674.04	<p>On page 135, under Workforce Development, there is a strategy related to "family-supporting jobs."</p> <p>Please add a definition for this term in the Glossary that includes more information on how SCAG defines a "family," how many members of this "family" are supposed to work to support the "family," and whether "family" also includes extended family not living in the same housing unit.</p> <p>Consider replacing the term "family" with "housekeeping unit," which could be defined as: "any group of individuals living together in one dwelling unit where the residents may share household responsibilities and activities such as living expenses, chores, and eating meals together."</p>	<p>Comment noted. The phrase "family-supporting jobs" is changed to "living-wage jobs." The definition for "living wage" is added to the Glossary.</p>
0001674.05	<p>Map 2-3 and Map 2-4 show a HQTC along Euclid Street within the City of La Habra. While the OCTA LRTP (Directions 2045) shows this bus line (Route 37) as a High Frequency Corridor, the ebusbook on OCTA's website shows that service in La Habra only occurs every 30 minutes during peak periods. Given that this is the only HQTC identified in La Habra, and State law development incentives for housing along HQTC, it is very important that the information reflected in documents and modelling is accurate.</p>	<p>Comment noted. SCAG's methodology for identifying High Quality Transit Corridors (HQTC) and major transit stops is documented in the Mobility Technical Report's Appendix #5. SCAG's assessment of HQTCs is based on a snapshot of 2022 data and/or of planned 2050 transit service based on information transit operators share. Connect SoCal reflects feedback that the Orange County Transportation Authority (OCTA) shared and is consistent with OCTA's Long-Range Transportation Plan that identifies Route 37 as a high frequency corridor.</p>
0001674.06	<p>Pg 12, 1st paragraph from the bottom of the page - Please provide a footnote/endnote to substantiate the statements made in this paragraph.</p>	<p>A reference has been added to the material which substantiates this assessment.</p>
0001674.07.1	<p>Pg 15, first sentence, last paragraph from the bottom of the page - Please verify that "household demand" is the correct term that should be used in this sentence; it seems that it should either be housing demand or household formation.</p>	<p>Edits have been made to clarify the terminology in this paragraph.</p>
0001674.07.2	<p>Pg 16 - there is a reference to Figure 6 but there is no Figure 6 in the document.</p>	<p>Figure 6 can be found on the prior page and is titled New Housing Units and Average Household Size.</p>
0001674.08	<p>Section 6.1 should also provide an analysis of the bureaucracy associated with these funding resources, the delays in funding/reimbursement that local jurisdictions have been experiencing, and the lack of long-term/permanent funding solutions.</p>	<p>The first paragraph of Section 6.1 Funding is changed to read, "Despite the various opportunities for jurisdictions to receive funding and technical assistance for projects, jurisdictions report lack of long-term/permanent funding and delays in funding/reimbursement continue to pose as a barrier to housing production."</p>
0001674.09	<p>6.2.1 - SCAG should work with HCD to pre-approve sites identified by the HELPR to meet RHNA allocation requirements. Many jurisdictions have struggled with HCD to get their Housing Elements approved due to HCD's subjective justification requirements to establish that housing sites will be developed within the 8-year planning horizon.</p>	<p>Comment noted. There would be significant challenges in receiving pre-approval for sites that meet RHNA requirements since each individual site requires extensive local analysis, such as the probability of site development within the RHNA period and AFFH. However, SCAG will continue to work with HCD to explore ways to streamline the process and provide technical assistance at various points of the housing element development process.</p>
0001674.10	<p>Pg 41, top paragraph - Please expand on the meaning of the statement "creating multiple points of entry to secure a building permit."</p>	<p>The third paragraph of Section 7.2 Streamlining the Approval Process is changed to read, "Once inefficiencies are identified, jurisdictions can implement strategies such as consolidating the review process, allow for both an online application process and over-the-counter service for building permits, creating an expedited process for certain types of projects such as affordable housing, updating permitting software, and lowering the threshold for projects to receive a ministerial permit."</p>
Submitted by	City of Menifee	Submittal 0001670
0001670.01	<p>ETHANAC ROAD MUST CONNECT THE 215 AND 15 FREEWAYS BETWEEN PERRIS AND MENIFEE. It will alleviate congestion and add better traffic flow.</p>	<p>Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. Please note that there are planned improvements along the eastern portion of the Ethanac Road corridor described in your comment. See RTP project IDs: #3160038, 3A01WT151, 424L018, 3A04WT191, 424L024, and 3A04WT092 for the noted improvements. Your comment will be available for Riverside County Transportation Commission's review.</p>
Submitted by	City of Murrieta	Submittal 0001747

ID	COMMENT	RESPONSE
0001747.01	<p>Household Growth</p> <p>The Draft Plan's anticipated household growth ignores the City of Murrieta's certified 2021-2028 Housing Element and General Plan Land Use Plan. In many instances household growth is attributed to areas that are built out and occupied by steep terrain, which reduces development capacity. To obtain a more accurate reading of Household growth occurring within the City, SCAG should compare its forecast against the City's residential activity map and supplemental list which can be found on-line at https://www.murrietaca.gov/746/Development-Services.</p> <p>The most significant omission in the Draft Plan is recognition of the City's annexation in 2022 of nearly 1,000 acres which includes an approved specific plan for 750 dwelling units.</p>	<p>The City of Murrieta provided growth projection information to SCAG in December 2022, prior to the conclusion of the Local Data Exchange (LDX) process. This process was administered collaboratively between SCAG, the Western Riverside Council of Governments (WRCOG), and a WRCOG consultant. SCAG received and directly integrated requested edits to small area household and employment growth data into Connect SoCal. The city's residential activity map was also provided at this time for SCAG's review during forecast development.</p> <p>As described in Section 4.6 of the Demographics & Growth Forecast Technical Report, it is not expected or required that every jurisdiction's household forecast match or exceed their 6th cycle Regional Housing Needs Allocation (RHNA), as a long-range projection involves many factors and reflects information available as of December 2022. Furthermore, as housing element update data are not available region-wide, it is not possible for site-level changes to be fully integrated into the plan's forecasted regional development pattern.</p> <p>We also understand from the city through LDX that there is meaningful household growth taking place in the city in response to zoning changes—specifically in areas that are infill-oriented and generally reflective of Connect SoCal strategies and policies as well as the statutory goals of the RHNA process. In addition, and owing in part to Connect SoCal's orientation toward households rather than housing units, it is possible for some Transportation Analysis Zones (TAZs) to reflect small amounts of growth due to Accessory Dwelling Units (ADUs), lot splits, reductions in residential vacancy, and other unconventional forms of growth that could occur by 2050. For these reasons, Connect SoCal places emphasis on the policies, goals, and strategies for the purposes of determining consistency rather than TAZ-level household and employment projections.</p> <p>Furthermore, LDX and the growth forecasting process rely on time-consistent, 2019 city boundaries to develop future projections for the region. Annexations taking place subsequently will be reflected in the 2028 Connect SoCal plan.</p>
0001747.02	<p>Proposed Livable Corridor within Murrieta</p> <p>The City of Murrieta objects to the Draft Plan's inclusion of what SCAG terms a "Livable Corridor". The corridor generally runs in a north-south direction beginning in the City of Lake Elsinore at its most northerly extent and ending in the City of Temecula at its most southerly point traversing through the cities of Wildomar and Murrieta. Through Murrieta, the corridor is typically one-mile wide and covers approximately 4,100 acres, or nearly 20 percent of the City's incorporated territory. Through Murrieta, no high quality transit corridors exist currently. The Draft Plan does not identify a future high quality transit corridors or transit priority areas being established. The City has no intention of intensifying land uses along the proposed Livable Corridor route in the foreseeable future, which currently extends out to 2035 in the City of Murrieta's most current General Plan. Such an undertaking would result in the displacement of existing residents, create incompatible land uses by grouping existing well-established and stable low density land uses with higher intensity uses that would add to excessive noise and air quality impacts already present due to the proximity of Interstate 15. Of more importance is the need for SCAG to recognize that significant portions of the proposed Livable Corridor is located in one or more dam inundation zones, included in Alquist-Priolo Earthquake Fault Zones, include areas susceptible to subsidence and liquefaction, or are within High Fire Hazard Severity Zones. Areas of the proposal are impacted by several of the referenced hazardous features. As a result of these challenges to the land, the placement of higher-density housing and employment centers are in appropriate and should be removed from the Draft Plan within the City's boundaries. These factors have supported the City's 30-year land use strategy of maintaining low intensity land uses in the western portion of the City.</p>	<p>Comment noted. Livable Corridors are one of four Priority Development Areas (PDAs) outlined in Connect SoCal. Priority Development Areas (PDAs) are areas within the SCAG region where future growth can be located in order to help the region reach Plan goals. While these areas generally reflect the principles and targets of Connect SoCal, they are merely suggestions and non-binding. Additionally, they were utilized as tools in developing the preliminary growth forecasts at the small area level. This data was then reviewed by local jurisdictions included Murrieta during the Local Data Exchange which took place between May 2022 and December 2022. Feedback was accepted during this time to modify SCAG's records for priority development areas boundaries; however, following their use as a growth visioning tool, the TAZ-level household and employment growth forecast data for Murrieta and other jurisdictions are operative and the boundaries of PDAs are no longer determinative.</p>

ID	COMMENT	RESPONSE
Submitted by	City of Oxnard	Submittal 0001669
0001669.01.1	<p data-bbox="212 142 384 170">December 6, 2023</p> <p data-bbox="212 228 732 394">Ms. Rachel Wagner Ventura County Regional Office Southern California Association of Governments (SCAG) 4001 Mission Oaks Blvd., Ste. L Camarillo, CA 93012 Via Email - wagner@scag.ca.gov</p> <p data-bbox="212 453 942 480">Subject: City of Oxnard's Comments on SCAG's Draft Connect SoCal 2024 Plan</p> <p data-bbox="212 509 380 537">Dear Ms. Wagner:</p> <p data-bbox="212 566 1085 618">Thank you very much for the opportunity to review and comment on the Draft Connect SoCal 2024 Plan. Our comments are as follows:</p> <p data-bbox="212 651 1123 820">The City of Oxnard recommends SCAG revisit the future growth projections from 2019 to 2050 on Page 81 of the Draft Connect SoCal Plan ("Plan"). The Plan's population and employment data shown under the 'Future Growth' column for Ventura County appear very low and inaccurate. Also, the Plan indicates that Ventura County's population and employment projections will decline significantly from 2035 to 2050. The City requests that SCAG revisit these projections as they do not seem to accurately portray the future of Ventura County.</p>	<p data-bbox="1136 142 2028 423">SCAG's county-level growth forecasts, including for Ventura County, were developed using the latest available data and under the advisement of a Demographic Panel of Experts (see Section 2.2 of the Demographics and Growth Forecast Technical Report). In addition, local jurisdictions were invited to review and revise household and employment projections in their jurisdictions. Following the City of Oxnard's review submitted to SCAG on November 22, 2022, its 2050 total households were increased from 65,600 to 70,600 and 2050 total employment from 65,500 to 72,900. These edits were both made and resulted in a Ventura County population, household, and employment projection that was higher than the preliminary figures developed with the expert panel (these can be found at https://scag.iqm2.com/Citizens/FileOpen.aspx?Type=14&ID=2286&Inline=True#page=53).</p> <p data-bbox="1136 453 2039 565">As described in Section 2.3 and Figure 2 of the Technical Report, given the long time horizon of Connect SoCal there is a wide range of possible future growth patterns for a county. However, data and expert insights do not suggest that the most reasonably foreseeable growth projection is significantly higher than the current Connect SoCal figures.</p> <p data-bbox="1136 594 2045 761">While Connect SoCal projects a total population of 852,000 in Ventura County in 2050 (1 percent higher than 2020), the California Department of Finance Projection (Series P-2A, July 19, 2023 version, see https://dof.ca.gov/forecasting/demographics/projections) projects a 10 percent decline from 2020 to 758,161. Part of this difference is due to the local insights provided by Oxnard and other local jurisdictions regarding a strong expectation of housing growth and development.</p> <p data-bbox="1136 790 2051 1044">The relatively slow growth anticipated in the county is attributable to deaths beginning to exceed births by the early 2030s and modest, as opposed to major, decreases in out-migration (a net of 1,200 residents leaving the county annually in the forecast compared to an average of 4,500 since 2010). Despite an aging population the county's age 16+ labor force participation rate is expected to remain steady at 60.5 percent—the employment projection does not decrease further in part due to the expectation that labor force participation amongst workers aged 65-79 increases from 24.8 percent to 29.1 percent. While it is certainly possible that population and employment growth will be higher, currently available data, regional expert insights, and local review relied upon for Connect SoCal's projection support the figures reported in Connect SoCal.</p>

ID	COMMENT	RESPONSE
0001669.01.2	<p>Unlike other municipalities in Southern California, the City of Oxnard and Ventura County do not have a transportation sales tax. Therefore, the City of Oxnard would like language added to Chapter 3, Section 3.3 which states: Assist local governments that lack local transportation sales tax funding and financing mechanisms to improve and expand public transportation. This would help ensure robust and reliable transportation infrastructure that would result in a reduction of local single-occupancy vehicle (SOV) trips, help achieve headway goals, and meet other state climate, housing, and transportation mandates.</p> <p>If you have questions, please feel free to contact Jasmin Kim at (805) 385-3945 or Jasmin.Kim@oxnard.org. Thank you.</p> <p>Sincerely,</p> <p>Kathleen Mallory, AICP, MA, LEED GA Planning and Sustainability Manager City of Oxnard</p> <p>C: Ashley Golden, Assistant City Manager, City of Oxnard Jeff Pengilley, Community Development Director, City of Oxnard Jasmin Kim, Principal Planner, City of Oxnard Vanessa Rauschenberger, General Manager, Gold Coast Transit District Amanda Fagan, Planning and Sustainability Director, Ventura County Transportation Commission</p>	<p>Comment noted. The Regional Planning Policies under funding the system/user fees address our strategies to support local and regional travel needs, and leverage funding and financing opportunities. Connect SoCal Regional Planning Policies also include transit and multimodal Integration strategies to improve mobility throughout the region.</p>
Submitted by	City of Oxnard	Submittal 0001710

ID	COMMENT	RESPONSE
0001710.01.1	<p data-bbox="210 94 903 121">My name is Jasmine Kim. I'm a planning supervisor for the City of Oxnard.</p> <p data-bbox="210 207 945 235">I'd like to make a brief comment on the Connect SoCal document on Page 81.</p> <p data-bbox="210 321 1102 406">I'd like SCAG to revisit the future growth pattern from 2019 to 2050 on page 81, specifically, for population and employment, because I think the data may be too low to be true for Ventura County.</p> <p data-bbox="210 492 1060 544">So, I'd like to make sure that staff has an opportunity to revisit the data for population and employ and employment.</p>	<p data-bbox="1134 94 2026 381">SCAG's county-level growth forecasts, including for Ventura County, were developed using the latest available data and under the advisement of a Demographic Panel of Experts (see Section 2.2 of the Demographics and Growth Forecast Technical Report). In addition, local jurisdictions were invited to review and revise household and employment projections in their jurisdictions. Following the City of Oxnard's review submitted to SCAG on November 22, 2022, its 2050 total households were increased from 65,600 to 70,600 and 2050 total employment from 65,500 to 72,900. These edits were both made and resulted in a Ventura County population, household, and employment projection that was higher than the preliminary figures developed with the expert panel (these can be found at https://scag.iqm2.com/Citizens/FileOpen.aspx?Type=14&ID=2286&Inline=True#page=53).</p> <p data-bbox="1134 406 2037 519">As described in Section 2.3 and Figure 2 of the Technical Report, given the long time horizon of Connect SoCal there is a wide range of possible future growth patterns for a county. However, data and expert insights do not suggest that the most reasonably foreseeable growth projection is significantly higher than the current Connect SoCal figures.</p> <p data-bbox="1134 544 2047 714">While Connect SoCal projects a total population of 852,000 in Ventura County in 2050 (1 percent higher than 2020), the California Department of Finance Projection (Series P-2A, July 19, 2023 version, see https://dof.ca.gov/forecasting/demographics/projections) projects a 10 percent decline from 2020 to 758,161. Part of this difference is due to the local insights provided by Oxnard and other local jurisdictions regarding a strong expectation of housing growth and development.</p> <p data-bbox="1134 738 2047 995">The relatively slow growth anticipated in the county is attributable to deaths beginning to exceed births by the early 2030s and modest, as opposed to major, decreases in out-migration (a net of 1,200 residents leaving the county annually in the forecast compared to an average of 4,500 since 2010). Despite an aging population the county's age 16+ labor force participation rate is expected to remain steady at 60.5 percent—the employment projection does not decrease further in part due to the expectation that labor force participation amongst workers aged 65-79 increases from 24.8 percent to 29.1 percent. While it is certainly possible that population and employment growth will be higher, currently available data, regional expert insights, and local review relied upon for Connect SoCal's projection support the figures reported in Connect SoCal.</p>

ID	COMMENT	RESPONSE
0001710.01.2	<p>And I'd like to just make another comment that in order to improve transportation network throughout Ventura County, we need more support for growth of investments in our bus network as well as, you know, considering innovative approaches, such as creating a light rail or bus system/bus rapid transit system within our counties.</p> <p>I am a strong supporter of an intra-county transportation network. Because I think it's important, as much as inter-county transportation network. And I worry that there will be more funding for the inter-county transportation network from counties to counties rather than intra-county transportation network.</p> <p>So, I just wanted to mention that we really need to build a more robust reliable transportation infrastructures within the cities and counties. As much as we are doing for the inter-cities and counties. To reduce any sort of local single occupant vehicle trips that could be eliminated within our cities and counties.</p> <p>Thank you.</p>	<p>Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region, both within and across cities and counties. Connect SoCal also includes the following strategy that supports creating transit/rail systems that connect more readily: "Enable a more seamless mobility experience through the implementation of Mobility as a Service (MaaS). This may include leveraging Cal-ITP's support, initiating open-loop payment demonstrations, and testing shared product systems and post-payment solutions." For reference, in 2022 SCAG completed the MaaS Feasibility White Paper to study the key building blocks for successfully implementing a MaaS system in the SCAG region, which would integrate transportation services into a single mobility platform to provide competitive alternatives over private vehicles, promote universal basic mobility, encourage mode shift, and foster sustainable travel choices. The Mobility Technical Report details additional strategies (e.g., dedicated bus lanes, mobility hubs, etc.) and investments that support growth towards the transportation vision.</p>
Submitted by	City of Oxnard	Submittal 0001712
0001712.01.1	<p>I just wanted to make another quick comment about Ventura County. I'd like to mention that Ventura County is a county that doesn't have sales tax measures earmarked for local public transit like City of LA or other counties in Southern California. And for that reason, we just need more support in terms of funding to improve our local public transit infrastructures and headways including our train headways that come to Ventura County.</p>	<p>Comment noted. Transportation sales taxes are approved by local voters. All transportation sales taxes included in the Connect SoCal 2024 financial plan are countywide. Connect SoCal includes several strategies to support ongoing and enhanced transit services.</p>
0001712.01.2	<p>And I just wanted to point out that the trolley down in San Diego has been a huge success...and that MTS is something that SCAG may want to look into in the future. Just as a reference, because it has been such a huge success down there. And it would be really amazing if we could bring something like MTS out here in Orange County, San Bernardino, or Ventura County.</p> <p>Thank you.</p>	<p>Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas. The Mobility Technical Report details the strategies (e.g., dedicated bus lanes, mobility hubs, etc.) and investments (e.g., California High Speed Rail, OC Streetcar, etc.) that support growth towards this vision.</p>
Submitted by	City of Oxnard	Submittal 0001828

ID	COMMENT	RESPONSE
0001828.01	<p>The City of Oxnard recently received notification that the Ventura County Department of Public Works and the California Department of Transportation (Caltrans) are proposing to widen an approximate 1.93-mile portion of Hueneme Road, between Edison Drive and Rice Avenue, within the City of Oxnard and County of Ventura from a two-lane roadway to a four-lane roadway with buffered bike lanes, a paved median, and turn lanes. This expansion will improve last mile freight activity as Hueneme Road serves as the main freight corridor between the City of Oxnard and the Port of Hueneme.</p> <p>We understand that the public comment period has ended for Connect SoCal 2024, but would like to confirm that this planned 1.93-mile expansion project is included in SCAG's planning documents, with particular attention to SCAG's Connect SoCal 2024 plan, SCAG's Goods Movement plan SCAG's Last Mile Freight Program, as well as an update to SCAG's Regional Transportation Plan.</p> <p>Please feel free to reach out to Jasmin Kim at jasmin.kim@oxnard.org should you have any questions regarding our comments. Thank you.</p>	<p>Comment noted. SCAG has confirmed that the project description in the comment is included within the financially constrained project list (VEN011202, Pg. 415) and is modeled in the Draft 2024 Connect SoCal plan.</p>
Submitted by	City of Pico Rivera	Submittal 0001666
0001666.01	<p>On behalf of Pico Rivera, Metro is submitting a request to include in the 2024 RTP the updated project scope for LA0G1106. This updated scope was included in FTIP Consistency Amendment #23-26. The scope was updated from a bridge expansion of 8 lanes (from 6 lanes) to a bridge replacement of the original 6 lanes. This updated scope changed the project conformity category from a modeled Non-Exempt to Exempt with no modeling project.</p>	<p>Updating the scope for FTIP project #LA0G1106 from 8 to 6 lanes converts the project into a bridge replacement project or non-capacity type project. The revision of the project's scope was revised to account for the reduction in bridge lane capacity and is determined to be a non-capacity/replacement type improvement and so is deemed to have a minimal effect on outcomes for Connect SoCal 2024 or the associated PEIR determination. The project's potential impact on transportation modeling, increases in criteria pollutants or GHG emissions, and impact on fiscal constraint were assessed and any effects are assumed to be negligible. The updated scope will be included in the Final Connect SoCal 2024.</p>
Submitted by	City of Riverside	Submittal 0001737
0001737.01	<p>The City of Riverside appreciates SCAG highlighting the City of Riverside PACT document as one of the recent Sustainable Communities Programs. We would like to supplement this information by requesting that SCAG consider adding the following information regarding recent grant awards received that were supported by the PACT document:</p> <ul style="list-style-type: none"> o The City was awarded \$0.7 million in Caltrans Sustainable Transportation Planning Grant Program to develop individual Safe Routes To School Action Plans for fifty (50) public K-8 schools citywide as supported by the PACT. o The City was successfully awarded \$11.1 million in federal funds through the Safe Streets For All (SS4A) Program to construct a road diet along Main Street between Third Street and the 60 Freeway along with a citywide speed limit reduction program and Vision Zero or update to the LRSP as referenced by the PACT's Complete Street's Ordinance and Active Transportation Plan. 	<p>The text has been revised to include the recent grant awards received by the City of Riverside.</p>
0001737.02.1	<p>The draft plan should be amended to include support for grade separations at existing at-grade crossings.</p>	<p>Comment noted. Connect SoCal includes the following transit/rail safety and security policy: "Support innovative approaches for addressing transit safety and security issues..." The Mobility Technical Report details Metrolink's SCORE program investments, which are assumed within the Plan and include new grade crossings, station and signal improvements as well as track additions that will allow much greater bi-directional train frequency and accelerate progress towards its zero-emissions future. Examples of projects include the Simi Valley Double Track, Chatsworth Station improvements, El Monte Siding Extension Project, and Rancho Cucamonga Siding Extension Project.</p>

ID	COMMENT	RESPONSE
0001737.02.2.1	SCAG should also provide additional detail regarding its role in implementing 15-minute communities across the region.	Comment noted. Under the "Communities" section of 3.3 of the Main Book, policies focused on 15-Minute Communities are framed in policy 42, 43, and 44. Additionally, under the "Communities" section of 3.4 of the Main Book, SCAG identifies a leadership role in 15 Minute Communities through the following strategy: Develop technical-assistance resources and research that support 15-minute communities across the SCAG region by deploying strategies that include, but are not limited to, redeveloping underutilized properties and increasing access to neighborhood amenities, open space and urban greening, job centers and multimodal mobility options. And to work as a partner to: Identify and pursue funding programs and partnerships for local jurisdictions across the region to realize 15-minute communities.
0001737.02.2.2	More detail should be provided regarding SCAG's planned leadership in planning for Connected and Autonomous Vehicles (CAV) beyond the references on pages 89 and 127. CAV should be a consistent and thoroughly considered component of our transportation strategy.	Comment noted. SCAG agrees that CAVs and their supporting infrastructure will be crucial for the regional transportation system. Connect SoCal identifies in Chapter 3 implementation strategies that include development of a Smart Cities vision plan and conducting a regional assessment of CAV implementation in the region to determine opportunities for future deployment, and develop toolkits and best practices for local jurisdictions.
0001737.02.3	Additional consideration and discussion should be provided for regional improvements surrounding the 2028 Olympics. SCAG is in a unique leadership position to help realize wide-scale improvements in preparation for the Olympics. Timelines should be provided for plan implementation strategies to maintain accountability.	Comment noted. As defined in the Code of Federal Regulations, the MPO is tasked with "consideration and implementation of projects, strategies, and services" that enhance travel and tourism in their continuous, cooperative, and comprehensive metropolitan transportation planning processes. While important, oversight and accountability of major events is not within SCAG or other MPO's jurisdiction and authority. Ongoing efforts taking place across the region in preparation for the 2028 Olympics will be addressed periodically through SCAG Regional Council and policy committee meetings.
Submitted by	City of Whittier	Submittal 0001820
0001820.01	Please see the below comments from the City of Whittier concerning the Draft PEIR [sic] for the SCAG Connect SoCal 2024 document. - The document may not reflect the updated General Plan land uses for the City of Whittier. The General Plan was updated in October 2021. This would have the most up to date land use information and forecasts for growth.	While existing land use and general plan data are inputs to the Connect SoCal 2024 growth forecast, the City of Whittier provided growth forecast data and a signed data verification form to SCAG on 12/1/2022. This form indicated approval of growth forecast data and notice of provision of an updated general plan layer. These forecast figures were integrated directly into the Connect SoCal 2024 growth projections. Any additional updates to General Plans can be shared and verified through the SCAG Regional Data Platform (rdp.scag.ca.gov) so that records can be kept up-to-date and to improve preliminary forecast development for Connect SoCal 2028.
0001820.02	- The City of Whittier is expected to be the final stop for Los Angeles Metro Light Rail L Line expansion. The light rail project is planned to be completed in phases and has encountered funding delays. It is likely that the City of Whittier will not see the light rail line reach its city limits until a date uncertain. This will affect Whittier's ability to build out any transit oriented development until the construction of the light rail station becomes more of a reality. Please consider this delay in any forecast for growth or transit oriented development.	The Connect SoCal 2024 growth projection reflects SCAG's preliminary, expert-informed growth projection and has integrated all edits made by local jurisdictions to total households and total employment in 2019, 2035, and 2050 as part of the Local Data Exchange (LDX) process. These data reflect final TAZ (Transportation Analysis Zone)-level input from jurisdictions which provided input or were granted an extension prior to the December 2, 2022 deadline. As such these plan data represent a snapshot in time and may not reflect subsequently available information. The City of Whittier provided SCAG with a signed data verification form on 12/1/2022 indicating approval of growth forecast data. Subsequently available information can be integrated into future plans or plan Implementation Strategies.
0001820.03	- The area of Whittier at the intersection of Washinton [sic] Boulevard and Byron Road is a strong job center and economic area of Whittier that is forecasted in the document to see a greater increase in total households. The city is unlikely to change the zoning in this industrial area and the industrial zone does not allow for residential development. The forecast may be using dated zoning information for the City of Whittier.	The Connect SoCal 2024 growth projection reflects SCAG's preliminary, expert-informed growth projection and has integrated all edits made by local jurisdictions to total households and total employment in 2019, 2035, and 2050 as part of the Local Data Exchange (LDX) process. These data reflect final TAZ (Transportation Analysis Zone)-level input from jurisdictions which provided input or were granted an extension prior to the December 2, 2022 deadline. As such these plan data represent a snapshot in time and may not reflect subsequently available information. The City of Whittier provided SCAG with a signed data verification form on 12/1/2022 indicating approval of growth forecast data. Subsequently available information can be integrated into future plans or plan Implementation Strategies.

ID	COMMENT	RESPONSE
0001820.04	- It was difficult to discern the map of Priority Development Areas in the SCAG Connect SoCal 2024, might there be an alternative method of displaying the map, perhaps with zoomed in sections that allow for more precise viewing.	Individual maps for each Priority Development Area (Livable Corridors, Neighborhood Mobility Areas, Transit Priority Areas, and Spheres of Influence) at the jurisdictional level can be found in the revised Data Map Books from November 2023 hosted on SCAG's Local Data Exchange website.
Submitted by	Climate Action Santa Monica	Submittal 0001729
0001729.01	The projects listed excessively prioritize automobile infrastructure at the expense of other mobility and land use investments that can help us meet our climate, equity, resource conservation and economic goals.	Comment noted. In accordance with state and federal requirements, the Connect SoCal financial plan must take into account all surface transportation projects and strategies proposed to be funded by federal, state, local, and private sources over the life of the Plan. The Project List Technical Report describes those transportation projects. Since the SCAG region must also demonstrate transportation conformity, the Project List must include additional detail on projects that can be modeled. Non-automobile projects like investments in active transportation typically cannot be modeled directly for transportation conformity and are therefore underrepresented in the project list.
0001729.02	Will the project list described in the plan lead to the VMT reductions essential to meeting VMT reduction goals stipulated by CARB and other goals essential to the wellbeing of the SCAG region?	The project list along with other policies and strategies included throughout Connect SoCal 2024 collectively achieve the GHG emission reduction targets established by CARB.
0001729.03	What alternative mobility projects, with the potential to be more effective at meeting CARB VMT reduction goals than enhancing automobile infrastructure, could the Connect SoCal Plan give a higher priority to, thereby leading to increased funding?	There are no known non-automobile-focused mobility projects that would result in increased funding.
0001729.04	One glaring omission in the Project List is the absence of bikeway implementation plans at the scale, investment level and timeframe that would enable them to meaningfully contribute to achieving the CARB VMT targets. Without such bikeway plans articulated, the Connect SoCal Plan under-funds and under-prioritizes an extremely valuable resource, is inadequate and therefore should be revised.	Comment noted. In accordance with state and federal requirements, the Connect SoCal financial plan must take into account all surface transportation projects and strategies proposed to be funded by federal, state, local, and private sources over the life of the Plan. The Project List Technical Report describes those transportation projects. Since the SCAG region must also demonstrate transportation conformity, the Project List must include additional detail on projects that can be modeled. Non-automobile projects like investments in active transportation typically cannot be modeled directly for transportation conformity and are therefore underrepresented in the project list. The draft Connect SoCal 2024 commits \$38 billion for active transportation investments over the life of the Plan. For final Plan investment information, please see the Transportation Finance Technical Report.
Submitted by	County of Orange	Submittal 0001720
0001720.01.1	Correction: Page 102 of the RTP/SCS Map on Page 102 indicates SOI on areas that the County has designated as Open Space. Please update map to remove SOI over areas of County Open Space.	Comment noted. Spheres of Influence (SOIs) are existing or planned service areas within the planning boundary outside of an agency's legal boundary; data for these areas was accessed by SCAG from each county's Local Agency Formation Commission (LAFCO) in 2019. The intent of an SOI is to promote the efficient, effective and equitable delivery of local and regional services for existing and future residents and to encourage a collaborative process between agencies. This boundary is in administrative boundary determined by the Local Agency Formation Commission and cannot be edited by SCAG.
0001720.01.2.1	General: Page 114 of RTP/SCS Define "Rolling Stock"	Comment noted. Rolling stock is defined on p. 104 of the Mobility Technical Report as "All revenue vehicles used in the provision of public transit (railcars, buses, ferries)."
0001720.01.2.2	and in #4, older adults and children are called out separately from pedestrians. Suggest "pedestrians such as older adults and children" if want to keep call out.	The text described vulnerable road users is updated from: " (e.g., older adults, children, pedestrians, bicyclists, etc.)" to " (e.g., people, especially older adults and children, walking and biking.)"
0001720.01.3	General: Page 71 Figure 18 of Equity Analysis Tech Document Gap between percentages should be consistent. Indicate the decimal difference, if necessary, the figures look inconsistent. Percentage on some graph figures include decimals and others don't, be consistent.	Data labels in (and reference text for) several figures, including Figure 18, have been updated to include the tenths place.

ID	COMMENT	RESPONSE
Submitted by	County of Ventura Planning Division	Submittal 0001683
0001683.01	<p>Map 2.7 (Existing Land Use) from Chapter 2 (Our Region Today) illustrates a further extent of the Agriculture Land Use in unincorporated Ventura County then is mapped by the Ventura County 2040 General Plan. The General Plan Land Use Diagram for unincorporated Ventura County is included as Figure 2-4 (General Plan Land Use Diagram) in the Land Use and Community Character Element of the Ventura County 2040 General Plan and is available at the following link: (https://docs.vcrma.org/images/pdf/planning/plans/Final_2040_General_Plan_docs/VCGPU_02_Land_Use_Element_2020_09_15_web.pdf).</p>	<p>Comment noted. The Local Data Exchange (LDX) process was developed to gather the most updated information available from local jurisdictions covering land use, growth and related plan inputs to inform the development of Connect SoCal 2024.</p> <p>Over the course of 2022, SCAG met one-on-one with all 197 local jurisdictions to discuss these data in their local context, provide background on Plan development and provide training on SCAG's Regional Data Platform which could be used to provide input. Input was due to SCAG by Dec. 2, 2022, for inclusion in Connect SoCal 2024.</p> <p>According to our records, we did not receive input on the Existing Land Use dataset from Unincorporated Ventura County during the local data exchange process. Input was received regarding General Plan, Key Entitlements, and Zoning. However, we will work with the county to ensure the existing land use dataset reflects the latest and greatest information prior to the development of Connect SoCal 2028.</p>
Submitted by	Dan Wentzel	Submittal 0001713
0001713.01	<p>Transit/Rail. Expand the region's dedicated lanes network—including new bus rapid transit, dedicated bus lanes, express bus service on managed and express lanes—as well as the region's urban and passenger rail network and transit/rail signal priority treatments. Improve transit/rail frequency, reliability, and fare and scheduling integration across operators</p> <p>-----</p> <p>THIS. THIS is the top priority. Rapid expansion of transit, regional rail, and bike infrastructure.</p> <p>SCAG should support the RCTC's Coachella Valley Rail Project SCAG should support double tracking Metrolink from Chatsworth to San Bernadino, from</p>	<p>Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas. The Mobility Technical Report details the strategies (e.g., dedicated bus lanes, mobility hubs, regional rail, etc.) and investments that support growth towards this vision.</p>
0001713.02	<p>SCAG should support transit lanes and bike lanes everywhere on all major corridors.</p> <p>We need a commitment to make Southern California multimodal.</p>	<p>Comment noted. Connect SoCal supports improving both mobility and accessibility across the region. As noted within the Plan, Connect SoCal envisions a future where transportation is efficient, multimodal and accessible to all. Connect SoCal's Mobility Technical Report describes in more detail the plan's active transportation and transit/rail strategies. SCAG's support for dedicated transit lanes and transit priority treatments is addressed in section 2.17.6 of the Mobility Technical Report. In April 2023, SCAG also published a Regional Dedicated Transit Lanes study further highlighting our efforts to improve transit speed and reliability. SCAG also published a transit priority best practices report in 2022 as part of the Dedicated Transit lanes study. Sections 3.14 and 3.15 of the Mobility Technical Report discuss increasing the number of bike facilities across the region. The Mobility Technical Report also describes SCAG's support of the development of more multimodal corridors through its facilitation of the state/regional Active Transportation Program.</p>
Submitted by	Eve Air Mobility	Submittal 0001745

ID	COMMENT	RESPONSE
0001745.01	<p>We appreciated the definition of Advanced Air Mobility (AAM) in the Chapter 2: "Our Region Today" under the Emerging Technology section, but would have liked to see additional references to AAM throughout the entire plan including the Executive Summary, and some of the other technical reports as the primary reference was in the Aviation and Airport Ground Access Technical Report on pages 15-18. AAM aligns with many of the connectivity, environmental, workforce development and other goals as outlined in the plan but isn't woven throughout the plan or embraced as a technology that can help achieve some of these goals. Additionally, AAM should be considered for inclusion in Sections 3.2-3.4 as SCAG prepares for a long range transportation plan through 2050. Specifically, it would be good to have AAM related policies and strategies included in each of these sections around mobility, connectivity and emerging technologies. While the technical report referenced above does have a greater focus on AAM, this focus is more of an overview of AAM and doesn't fully capture the alignment to SCAG's goals, policies and strategies to implement.</p> <p>For some frame of reference, the Miami-Dade County TPO recently released their Urban Air Mobility: Policy Framework and Strategic Roadmap in November 2023. While the primary document is comprehensive in capturing an overview of AAM and how the county's TPO is preparing for future operations, page 5 of the Executive Summary (https://www.miamidadetpo.org/library/studies/mdtpo-urban-air-mobility-policy-framework-and-strategic-roadmap-executive-summary-2023-11.pdf) shows how AAM aligns with the goals of the County's 2045 Long Range Transportation Plan and will be included in the 2050 LRTP that is still being developed. The Executive Summary can be found on the TPO's website and could be used a reference point for SCAG as they consider how they could update this plan to better reflect how AAM aligns with their goals and include throughout.</p>	<p>Comment noted. As detailed in the Regulatory Framework section of the Aviation and Airport Ground Access Technical Report, a MPO's (including SCAG) primary role in aviation systems planning is airport ground access and surface transportation planning. MPOs do not have regulatory, operational, or planning authority or jurisdiction over airports. Airport planning is under the jurisdiction of the airports (usually owned and operated by local governments). Airspace planning and regulation is under the jurisdiction of the FAA. Finally, in California, the Airport Land Use Commissions oversee airport land use decisions. The MPO's role in aviation systems planning is to complement, not guide, the planning efforts of the airports and the FAA, particularly as it relates to surface transportation. As far as AAM is concerned, currently, the airspace and aircraft regulation is being led by the FAA and the overall operational framework led by NASA and the FAA. Land use and infrastructure decisions will be made on the local level. AAM planning must also work within local, state (e.g., electric grid), and federal infrastructure. Similar to the airports, the MPO's role with AAM planning is to complement, not guide, the efforts of the FAA and the local governments by providing information and data and facilitating interagency communication and collaboration. Moreover, AAM is still a new mode with new technology where the AAM aircraft and infrastructure (e.g., vertiports) have not been certified or standardized. Given the uncertainty in AAM technology and infrastructure, and the MPO's collaborative and facilitative role in aviation systems planning, it would not be sensible to embed AAM into Connect SoCal at this stage. The purpose of the Connect SoCal is not to advocate for or endorse new, still unproven, technologies. Rather, as with other emerging technologies, Connect SoCal provides information that will assist local government agencies to make sound transportation planning and investment decisions. The Miami-Dade County document is not an apples-to-apples example for a regional transportation plan, as it is a document prepared by a county in a working agreement with Eve Air Mobility. Depending on the future development of AAM, AAM may become emphasized further in future Connect SoCal updates. Connect SoCal is an evolving document, which is why it is updated every four years.</p>
Submitted by	Federal Aviation Administration	Submittal 0001673
0001673.01.1	<p>Page 4, Section 2.2 Airports and the Federal Aviation Administration (FAA): o Recommend that the FY-2023 National Plan of Integrated Airport Systems available at https://www.faa.gov/airports/planning_capacity/npias/current be considered as a source to update and clarify airport roles within the system.</p>	<p>Comment noted. Narrative text will be edited to provide clarification. Please note that in addition to additional text in the body of the technical report an endnote referring to the FAA NPIAS website was added without the weblink (it is SCAG's practice not to include web addresses in Connect SoCal as the web addresses may become outdated and out of use).</p>
0001673.01.2	<p>o The discussion should clarify that airports are owned by public agencies and in certain instances private entities (Airport Sponsors).</p>	<p>Comment noted. Narrative text will be edited to provide clarification.</p>
0001673.01.3	<p>o First paragraph, last sentence, should be revised to clarify that the planning and operations at airports are primarily the responsibility of the Airport Sponsors.</p>	<p>Comment noted. Narrative text will be edited to provide clarification.</p>
0001673.01.4	<p>o Second paragraph, it is the Airport Sponsor that plans landside transit needs not the FAA. Further the FAA authority over airport land uses was modified on October 5, 2018, when H.R. 302, "FAA Reauthorization Act of 2018" was signed into law (P.L. 115-254).</p>	<p>Comment noted. Narrative text will be edited to provide clarification.</p>
0001673.01.5	<p>o Suggestion start a new paragraph at "The MPO's role in aviation systems planning is airport ground access...." The MPO is distinct from the role of an Airport Sponsor or the FAA.</p>	<p>Comment noted. Narrative text will be edited.</p>

ID	COMMENT	RESPONSE
0001673.02	<p>Page 10, Section 2.4.6, last full paragraph, "Per the Vision 100-Century of Aviation Reauthorization Act (Public Law 108-176) the airports are required to produce airport-level noise contour maps and make them available to the public.17" Footnote 17, Federal Aviation Administration (FAA): Airport Noise and Land use Information.</p> <ul style="list-style-type: none"> o This statement is not correct, and the source is not properly identified as the FAA website. o Airport Noise Compatibility Planning (14 CFR Part 150) is a voluntary program. Information is available here https://www.faa.gov/airports/environmental/airport_noise o The correct quote is "The Vision 100-Century of Aviation Reauthorization Act (Public Law 108-176) required FAA to "make noise exposure and land use information from noise exposure maps [prepared under 14 CFR part 150] available to the public via the internet on its website in an appropriate format." This statement is located at https://www.faa.gov/airports/environmental/airport_noise/noise_exposure_maps. 	Comment noted. Narrative text will be edited to provide updated data/information.
0001673.03	<p>Page 17, Section 3. Existing Conditions, Sub-Section 3.1.1 Hollywood Burbank Airport (BUR): "New Airport Terminal: BUR is currently in the project planning process for a new, relocated, terminal. Although modernization is one factor, the primary reason for the new terminal is safety. The current terminal building is located too close to the runways and thus not in compliance with FAA standards. Although the new terminal building will enable faster processing in and out of the airport, it will increase capacity."</p> <ul style="list-style-type: none"> o From the EIS Purpose and Need: "The Airport does not currently operate at or near its maximum theoretical operational capacity. Airport capacity and aircraft delay, for the purpose of airport planning and design, is discussed and measured according to methods in FAA Advisory Circular 150/5060-5, Airport Capacity and Delay. The operational capacity of the Airport is determined by its movement areas including its two runways, their length and strength, and their intersecting orientation. The capacity (hourly or annual throughput) of an airport is not determined by the non-movement areas (e.g., aircraft parking aprons). The Purpose and Need of the Proposed Action in response to the Sponsor's Proposed Project does not include changing the maximum hourly, daily, or annual operational capacity of the Airport. In addition, the Proposed Project does not result in changes to the Airport's runway configuration, aircraft fleet mix, number of operations, timing of operations, air traffic procedures, or airspace." 	Comment noted. Narrative text will be edited to provide updated data/information.
Submitted by	Five Point Operating Company, LP	Submittal 0001675

0001675.01.1 We have been advised by the Planning Director of the County of Los Angeles to contact you directly to correct an error in the Draft Connect SoCal 2024 ("Draft"). The Draft erroneously omits a substantial portion of the homes and employment/jobs included in our Newhall Project from the traffic analysis zones ("TAZ") growth projections.

Our Newhall Project's population and employment projections have been included in all prior versions of Connect SoCal. Many residents have already moved into our new community, and many more homes and employment centers are under construction or planned as part of project buildout. The planned residential units for our project are also in the County's state-certified Housing Element, which must be adopted by the Board of Supervisors. Finally, ours is California's first large, master-planned development project to commit to achieving "Net Zero" greenhouse gas emissions, as verified by the state's climate agency expert, the California Air Resources Board ("CARB").

We respectfully request that the Draft be revised to include household and employment projections for 2050 in the following TAZs to account for our Newhall Project. The table below reflects the projections based on growth anticipated by the Los Angeles County-adopted Newhall Ranch Specific Plan and Santa Clarita Valley Area Plan, which include existing and proposed growth within each TAZ. (See Exhibit 1, Stantec, Proposed Revisions to Draft SCAG RTP/SCS Zonal Data, December 1, 2023, for additional details.) The County Department of Regional Planning has reached out to use and advised that they will also provide you with updated household and employment projections consistent with our estimates in order to accurately reflect the Newhall Project's planned development.

TAZ: 20224100; Proposed 2050 Households: 2,720; Proposed 2050 Employment: 12,296
 TAZ: 20224200; Proposed 2050 Households: 2; Proposed 2050 Employment: 12,788
 TAZ: 20226100; Proposed 2050 Households: 24,076; Proposed 2050 Employment: 37,765
 TAZ: 20227100; Proposed 2050 Households: 7,000; Proposed 2050 Employment: 6,917

As the county's letter had noted at the conclusion of the Local Data Exchange process in December 2022, it was likely that by early 2024 additional information would become available regarding the progress of several key development projects.

Changes to entitlement information for the long-run (in this case, the 2035-2050 period) are one of numerous inputs to SCAG's growth forecasting methodology, which seeks to ensure a balance between regional and local expertise as well as a balance between future population, households, and employment. This means that all local changes are assessed in their regional context, and all changes are considered in terms of their impact on the relationships between jobs and people, and people and housing.

Los Angeles County is the only one of the region's 197 local jurisdictions to note forthcoming changes prior to the 12/2/22 LDX deadline and follow-up with specific requests prior to the 1/12/24 Connect SoCal public comment deadline. As such staff are able to integrate this revision request, which covered total households and total employment in 6 Transportation Analysis Zones (TAZs) across two major developments (Newhall Ranch and Centennial) into the final plan.

In the case of Centennial, staff are able to directly increase 2050 households from the draft plan total of 12,050 to the requested amount of 18,173. Similarly, we are able to increase the 2050 employment total from 8,782 to 23,675. This results in a jobs-to-household ratio in the Centennial project area of 1.30, which is very close to the county-wide ratio of 1.31 we anticipate in 2050 and appears generally consistent with the principles which guided Regional Growth Forecast development.

In the case of Newhall Ranch, we are able to directly increase the 2050 households from the draft plan total of 23,761 to the requested amount of 33,798. However, increasing the 2050 employment from 37,854 to 69,766 resulted in a number of technical and practical challenges for the growth forecast and plan targets. In contrast, Connect SoCal 2020's horizon year of 2045 projected 29,057 total jobs across the four-TAZ Newhall Ranch project area and it is unclear what has led to such a significant change in the long-run outlook. More broadly, the draft plan anticipates 2019-2050 employment growth in all of unincorporated Los Angeles County to be only +29,400 jobs. The total requested increase across both projects would reflect a 260 percent increase in the SCAG Region's second-largest jurisdiction and would represent an extreme outlier.

Furthermore, the result of the change would engender an imbalance of jobs and housing with 2.06 new jobs per new housing unit—well above the countywide ratio. This is reflected in an analysis using SCAG's Scenario Planning model, which showed a 0.114% increase in Vehicle Miles Traveled (VMT) per capita in 2050 compared to the draft plan, suggesting that such a magnitude of employment growth would result in additional trip-making from further parts of the region, namely the LA basin.

Instead, in order to account for the increase request and maintain a consistent methodological approach across the region, the 2050 employment in the Newhall Ranch area was instead increased proportional to the requested increase in 2050 households using the aforementioned county-wide ratio of 1.31 new jobs per new household. This results in a 2050 employment total of 51,029 across the four-TAZ Newhall Ranch area.

The net result of the changes using our Scenario Planning Model's 2050 VMT/capita across all of Southern California is an increase in 0.080% compared to the draft plan, and a reduction of the share of household growth in Priority Development Areas (PDAs) from 67% to 66%. However, this alone does not cause the region to miss its primary plan targets and is superior to the approach which included the full employment total requested.

ID	COMMENT	RESPONSE
0001675.01.2	<p>We very much appreciate the time you have spent with us. To avoid potential confusion in the future, we respectfully request that in future updates to Connect SoCal, TAZ household and employment projections not be modified without notice to landowners, for an opportunity to review and comment, to help ensure consistency with local adopted planning documents and development plans.</p>	<p>The Connect SoCal growth forecasting process relies principally on expert projections plus local jurisdiction review. Each regional plan begins with an assessment of the long-range outlook for population, households, and employment by a Demographic Panel of Experts. As such the broader demand conditions—as well as other policy, environmental, and unforeseen factors impacting total growth—may differ plan-over-plan and may impact the projection.</p> <p>SCAG ensures that data for local review are made public in order to provide an open process for the benefit of additional interested parties in order to improve the accuracy of the projection. We encourage and appreciate the engagement of landowners in this process since key entitlements are a major input into the plan's projections.</p>
Submitted by	Friends of Harbors, Beaches and Parks	Submittal 0001685
0001685.01	<p>FHBP has the following general questions:</p> <ol style="list-style-type: none"> 1. We understand there is a numerical density cut-off in greenfield land consumption; however, the potential for wildlife impacts appear to be considerably worse. <p>How was it determined that the scenario planning models in Connect SoCal 2024 are superior to the baseline, despite the projected increases in population, housing, and jobs?</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>

ID	COMMENT	RESPONSE
0001685.02	<p>2. The Plan states in Section 1.2 (pg. 12), "Sixty-seven percent of new households and 55 percent of new jobs between 2019–2050 will be located in Priority Development Areas, either near transit or in walkable communities."</p> <p>FHBP is pleased that SCAG recognizes that new development should be focused in areas where existing transit and services are located—especially because of its tie to emissions reductions. Please explain how this will be encouraged in SCAG's numerous jurisdictions. What benchmarks will be followed?</p>	<p>Comment noted. In section 3.4, strategies are defined to help facilitate how these policies will be implemented. For example, in the "Communities" Section of 3.4, "SCAG will support local jurisdictions and implementing agencies' strategies to promote plans and projects within PDAs by providing awards, grants and technical assistance." This section also indicates that "SCAG will partner with local jurisdictions to develop housing in areas with existing and planned infrastructure and availability of multimodal options, and where a critical mass of activity can promote location efficiency."</p>
0001685.03	<p>3. Connect SoCal assumes only 1,891 acres of improved habitat.</p> <p>How was this figure derived?</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>

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0001685.04	<p>FHBP appreciates the explanation of the vision set for 2050, and we think it reflects the SCAG communities' goals: healthy; prosperous; accessible; connected. Furthermore, the focus on mobility and connecting our region's communities is key to other objectives such as sustainability. The Plan states, "The region's communities are often fragmented, lacking connectivity, and having unequal access to housing and essential services such as education, healthcare, and employment." (pg. 6) Encouraging connectivity among our communities promotes sustainability in that housing, jobs, and open space is more universally accessible by all communities in the SCAG region.</p> <p>SCAG should encourage increasing connectivity through pilot programs, grants, and programs that remove the barriers and impediments (such as block walls, fencing, and slopes) by creating pedestrian friendly access (such as entrance cut outs, ramps, and staircases) to community amenities.</p>	<p>Comment noted. SCAG has several pilot programs and grant opportunities to improve accessibility for people walking, such as facilitating the regional component of the State's Active Transportation Program (ATP) grant program and associated Sustainable Communities Program Active Transportation & Safety call for projects. These programs fund planning and implementation projects to improve the safety, comfort, and accessibility for not only people walking but also biking, riding transit, and other forms of active transportation. SCAG is supplementing the ATP with a federal Safe Streets and Roads for All grant to fund quick build projects, which not only build community support by testing transportation infrastructure in a way that communities feel more comfortable with (piloting treatments for 1-5 years vs. permanent installations) but can also respond relatively quickly to immediate safety and accessibility needs.</p>
0001685.05	<p>On page 10, the Executive Summary outlines that, "urbanization continues to consume farmlands and open spaces, which contributes to the loss of groundwater supply and habitat areas that play a critical role in strengthening the region's resilience. SCAG will collaborate with federal, state, and local partners to ensure that the implementation of the Plan helps address existing air quality challenges, preserve natural lands, and reduce GHG emissions." (emphasis added with underline). With such a bold statement in Connect SoCal it is surprising to see that a plan that spans the next 26 years only anticipates 1,891 acres of habitat to be improved across six counties. (See Land Use Technical Report, pg. 44)</p> <p>Why is this number so low, especially when the Plan notes a goal is to be more resource efficient? (See Connect SoCal, pg. 11) Furthermore, if the population is trending toward decline (See pg. 31), why aren't the natural lands preservation numbers higher?</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>

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0001685.06	<p>As noted in the Natural Lands Coalition letter, FHBP is also pleased to see the environment listed as one of the four core goals of the Plan, in addition to community, economy, and mobility. (pg. 11)</p> <p>We appreciate that these goals are recognized for their interconnectedness and not seen as siloed.</p>	Comment noted.
0001685.07	<p>The Plan notes (pg. 13) that SCAG doesn't directly implement or construct projects, but instead helps facilitate them. The work done to date by SCAG on the SoCal Greenprint and Regional Advance Mitigation Program (RAMP) is a prime example of how SCAG's leadership can help facilitate improved regional planning, project implementation, and provide net environmental benefit through the protection of natural resources, while projects and housing are built across the region.</p> <p>We had hoped to see the next level of planning to carry this theme forward. More specifically, SCAG should incorporate pilot projects, assist with grant funding, and link those projects in need of mitigation with entities that can identify or manage mitigation lands.</p>	Comment noted. RAMP was previously a mitigation measure in the Connect SoCal 2020 PEIR. In this cycle, RAMP has been elevated to a plan feature, and is included as an Implementation Strategy.
0001685.08	<p>FHBP supports SCAG's commitment to take into account, in the development of policies, the historic limitations in mobility, housing, and accessing essential services due to federal, state, and local policies that have resulted in racial segregation, gentrification, displacement, and systemic underinvestment.</p> <p>We encourage SCAG in its efforts to directly address the range of economic and social impacts, such as health outcomes, education, employment, housing conditions, rates of incarceration, and life expectancy in this region based on race, income, and location.</p>	Comment noted. SCAG looks forward to continuing our work to advance justice, equity, diversity, and inclusion throughout Southern California in accordance with SCAG Resolution 20-623-2 and the Racial Equity Early Action Plan.
0001685.09.1	<p>We appreciate SCAG's intent on "Planning for Justice." (pg. 27) These steps are much improved over past plans. However, we are surprised there is no substantive mention of the loss of land, language, culture, and life of California Native American Tribes who were in Southern California since time immemorial.</p>	<p>Comment noted. The "Planning for Justice" and "Policy Roots of Inequality" sections provide just some of historical context most closely tied to the policies that SCAG touches on in Connect SoCal 2024. The Equity Analysis Technical Report includes specific details on how Native American populations in the SCAG region face challenges related to measures of mobility, community, environment, and economy. A new paragraph has been added to "SCAG Context" section of the Equity Analysis Technical Report to include more history.</p> <p>SCAG staff thoughtfully discussed, and ultimately decided against including a land acknowledgement in Connect SoCal 2024. The agency has been in internal discussion about land acknowledgements, but has not yet purposefully developed one for the agency in the hopes of doing so meaningfully and collaboratively with tribes that border SCAG jurisdictions.</p> <p>SCAG aimed to conduct meaningful outreach with California Native American Tribes throughout the development of Connect SoCal, as well as through several other SCAG programs, including, but not limited to, the Regional Early Action Program 2.0, Digital Action Plan, and Sustainable Community Program.</p>
0001685.09.2	<p>The Plan lacks substantive goals and policies related to working and collaborating with tribes and even how/if tribal consultation is occurring during this planning process.</p>	Comment noted. The Tribal Consultation process, including the overall outreach and engagement process, for Connect SoCal 2024 is summarized in the Public Participation and Consultation Technical Report.

ID	COMMENT	RESPONSE
0001685.10	<p>Under the “Step Toward Fairness” section, (pg. 28) it relays three ways disparities have occurred: health, wealth, and opportunities.</p> <p>We encourage SCAG to also consider “access” as an institutional and systemic barrier.</p>	<p>Comment noted. SCAG's work towards racial equity, including Resolution 20-623-2 and the Racial Equity Early Action Plan specifies several institutional and systemic barriers beyond the three ways listed in the section mentioned. In these documents and the Equity Analysis for Connect SoCal 2024, accessibility is considered in the concept of mobility (e.g., access to everyday destinations [including parks], commute time, vehicle ownership, transportation system mode share) and in other areas including, but not limited to, health care access and broadband access. Although “access” is not named in this sentence, SCAG considers access inherent to each of the disparities listed and is a central component of the Plan's vision. Additionally, SCAG applies an equity lens throughout the Plan, including discussions of access disparities.</p>
0001685.11	<p>SECTION 2.2 NEW AND EVOLVING TRENDS Rethinking the Workplace</p> <p>On page 32, SCAG is assuming roughly 22–25 percent of workdays will be conducted at home through 2050. This has enormous impacts on all matters related to land use, especially transportation, the building of new commercial space, and related impacts to open space.</p> <p>How is SCAG accounting for the one quarter reduction in traditional means of working in its policies? What does this mean for mobility needs and access to technology?</p>	<p>This assumption has been embedded into growth projections, travel demand models, and performance measures in Connect SoCal 2024 and is based principally on data from the American Community Survey (ACS) data (see, e.g. https://scag.ca.gov/post/american-community-survey-2022-data-release) and the Survey of Work Attitudes and Attributes (www.wfhresearch.com).</p> <p>For additional context, in 2019 roughly 9 percent of workdays were conducted at home, and in the prior Connect SoCal plan, this was expected to increase to 17 percent by 2050. While this change is significant, based on the best information currently available it would not be accurate to assume that it results in a one-quarter reduction in the traditional means of working.</p> <p>Connect SoCal's emphasis on broadband connectivity and regional planning policies such as 15-minute communities (which emphasize reducing the distance and single-occupant vehicle share of non-work trips) address these changes with a community and home-based orientation.</p>
0001685.12	<p>SECTION 2.2 NEW AND EVOLVING TRENDS Climate Change</p> <p>FHBP supports SCAG's identification of areas that should not be developed. Specifically, the language that states Connect SoCal will de-prioritize growth on lands that are vulnerable to wildfire, flooding, and sea level rise.</p> <p>Building in locations with these significant vulnerabilities ignores public safety, the human and financial costs of disasters, and the realities that face our region. While more will be covered in a supplemental letter, residents are already facing policy premium increases or lack of coverage altogether by the insurance industry in wildfire prone areas in California. This carries enormous risk both for residents and home builders.</p>	<p>Comment noted.</p>
0001685.13	<p>SECTION 2.2 NEW AND EVOLVING TRENDS Climate Change</p> <p>It is surprising to not see access to parks identified as a detrimental effect related to climate change in the Plan. (See pg. 35) Parks are known to reduce urban heat islands, capture and filter water, and improve health—among many other benefits. (Reference the Natural Lands Coalition letter for reports/studies).</p>	<p>Comment noted. Park access is included in several of the Plan's policies and strategies to address climate hazards, especially in the context of equity and environmental justice. See section 6.2 of the Land Use and Communities Technical report for more details.</p>

ID	COMMENT	RESPONSE
0001685.14	<p>SECTION 2.2 NEW AND EVOLVING TRENDS Resilience</p> <p>According to the Plan on page 36, "Resilience is defined as the capacity of the SCAG region's built, social, economic, and natural systems to anticipate and effectively respond to changing sustainable, thriving and equitable future."</p> <p>FHBP would like SCAG to consider examining resilience to the built environment. Sea level rise is an existing stressor that isn't subsiding. SCAG should include policies, mitigation measures, and performance measures to examine the vulnerabilities and provide policies that ensure our built systems such as transportation and utilities can withstand the challenges posed by sea level rise.</p>	<p>Comment noted. SCAG included sea level rise as an important factor in the development of Connect SoCal's locally-informed Forecasted Regional Development Pattern, as detailed in Section 5 of the Land Use and Communities Technical Report. The Implementation Strategies included in Chapter 3 include: "Support integration of climate vulnerability assessments into infrastructure planning and delivery for implementing agencies"</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-4 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001685.15	<p>SECTION 2.2 NEW AND EVOLVING TRENDS Resilience</p> <p>It is important to note that SCAG and local/regional jurisdictions can plan for many of the shocks and stressors identified in the Plan. (pg. 36)</p> <p>While the document identified shocks and stressors, it didn't account for the need to plan for them either through assessments, SWOT analyses, or other methods like climate action plans.</p>	<p>Comment noted. Assisting local jurisdictions in planning for climate change and strengthening community resilience is including in the Regional Planning Policies and Implementation Strategies and addressed in the Land Use and Communities Technical Report.</p>
0001685.16	<p>SECTION 2.2 NEW AND EVOLVING TRENDS Resilience</p> <p>While we agree that "Natural systems can adjust and continue to provide essential resources, including clean air and groundwater, and maintain functioning ecosystems," (pg. 36), there is a limit to the system's ability to function. If the cogs in the natural system aren't functioning correctly, other cogs disappear, spin out of control, are lost, etc.</p> <p>The system has a finite capacity to adapt and this should be acknowledged.</p>	<p>Comment noted.</p>
0001685.17	<p>SECTION 2.2 NEW AND EVOLVING TRENDS Resilience</p> <p>On page 46, the Plan states, "Overall, the core transportation funding sources that our region has traditionally depended on are declining, volatile, and uncertain." The Plan doesn't seem to acknowledge that more people are working from home. Less driving, equals less gas-tax funding, equals less road impacts, and fewer greenhouse gas (GHG) emissions. The Hill recently reported in July 2023 that the Federal Highway Administration notes fewer teens are driving and many are delaying getting their driver's license.</p> <p>New planning and adaptive policies must occur that take these changes into account.</p>	<p>Comment noted. The financial plan is informed by Connect SoCal 2024 telework assumptions. Telework assumptions, and other travel trends that decrease VMT, are incorporated into the SCAG activity-based model. Plan telework assumptions are discussed in Chapter 2 and the Congestion Management Technical Report.</p>
0001685.18	<p>SECTION 2.2 NEW AND EVOLVING TRENDS Resilience</p> <p>It is important to note that land availability is an important consideration and factor as it relates to development costs and even natural resource protection, as outlined on page 49.</p> <p>The concept of land availability was omitted from the constraints listed at the bottom of the paragraph, and should be included.</p>	<p>"Beyond planning challenges, the cost of building residential units is another primary barrier to meeting housing need" is changed to read "Beyond planning challenges, the availability of land and cost of building residential units is another primary barrier to meeting housing need".</p>

ID	COMMENT	RESPONSE
0001685.19	<p>SECTION 2.3 REGIONAL CHALLENGES Key Community Challenges</p> <p>On page 55, SCAG outlines challenges the community is facing such as housing affordability, homelessness, out-migration, and slow growing sustainability. Regarding out-migration, like the increasing trend of working from home, SCAG must take into account the growing trend of out-migration from the State and region, especially as it relates to housing needs, transportation to supporting housing and the workforce, and the impacts to the environment.</p>	<p>The Demographics & Growth Forecast Technical Report provides further detail about expert projections and data used for the Connect SoCal growth forecast. Specifically, this report notes that, as has now been the case for 31 of the past 33 years, the number of Southern Californians leaving for other regions and states exceeds the number entering from other regions and states; nonetheless, population continued to increase through 2019. Section 3.1 describes how negative net domestic migration is a longstanding feature of Southern California's demographics. Despite a temporary increase during COVID-19, per state Department of Finance Data (E-2 estimates) the level of "outflow" is in fact not growing and receded dramatically by mid-2023. In Los Angeles County in particular, population loss due to out-migration is at its lowest level since 2012. The technical report describes that a substantial portion of the recent population decline can instead be attributed to three principal factors related to COVID-19: a dramatic decrease in immigration due to border closures, excess deaths from the pandemic, and the temporary increase in "outflow."</p> <p>The forecast's theme of "Slower Growth, Steady Improvement" is intended to capture the comparatively modest population growth envisioned here in the context of regional planning by emphasizing the continued need for housing, supportive infrastructure, and the opportunity it presents for improved environmental protection.</p> <p>The plan document makes extensive use of American Community Survey (ACS) data (see, e.g. https://scag.ca.gov/post/american-community-survey-2022-data-release) and the Survey of Work Attitudes and Attributes (www.wfhresearch.com) to develop model and plan assumptions for future travel to the portion of jobs (assumed to be 36.7 percent, see page 32) which can be performed at home. More information can be found in the Demographics & Growth Forecast Technical Report section 3.3.2. In addition, SCAG is beginning to rely upon location-based services data and integrating the recently-released 2022 National Household Travel Survey into our ongoing planning and implementation processes.</p> <p>The locally-reviewed projections match the county and regional-level population, household, and employment totals developed by the expert and data-informed process described above, which account for migration and other demographic trends as well as the impact of work-from-home on region-level employment.</p>
0001685.20	<p>SECTION 2.3 REGIONAL CHALLENGES Key Community Challenges</p> <p>Also on page 55, SCAG says that, "Regionwide, most of the housing and built environment that we will have in 2050 exists today. Turning the tide on long-standing land use patterns and transportation investments can take a long time, where implementation follows years of planning. This means that even though newer development is trending to be more sustainable than in the past, the pace of progress may be slower than needed." This highlights the need for SCAG to encourage retrofitting existing homes to be more sustainable, maintain open space and farmlands for future generations, and invest in the maintenance of existing transportation infrastructure. Furthering this point, on page 57, the Plan identifies that 40,000 acres of farmland and 50,000 acres of natural lands were lost in the last decade.</p> <p>This must be addressed, and if what we see now is what will support our region in 2050, we must ensure its sustainability by focusing on investing in on-going infrastructure maintenance, supporting 15-Minute Communities, and focusing on retrofitting existing structures including incomplete housing units. More will be covered in a supplemental letter on this topic.</p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001685.21	<p>SECTION 2.3 REGIONAL CHALLENGES</p> <p>Key Community Challenges</p> <p>SCAG outlines, “Collaboration and policy leadership: Coordinating policies across jurisdictions is crucial to successful Plan implementation. SCAG will collaborate with local governments, transit agencies, and other stakeholders to align land use and transportation planning, streamline regulations, and encourage cooperation.” (pg. 62) We are surprised after such a robust effort to include the public and non-profit community in the creation of Connect SoCal, that the community-based organizations and non-profit sectors are not specifically mentioned here—especially as it elates to expertise and land management for RAMP implementation.</p> <p>We suggest—at a minimum—including non-profit organizations in this partnership list.</p>	<p>This text has been updated to include non-profit and community-based organizations to reflect the importance of these sectors in regional collaboration.</p>
0001685.22.1	<p>SECTION 2.3 REGIONAL CHALLENGES</p> <p>Key Economic Challenges</p> <p>On page 62, the key economic challenges in the SCAG region are identified as lack of economic opportunities, aging population, and increasing supply chain complexities.</p> <p>FHBP supports SCAG in its efforts to support residents to participate in the emerging green technology field.</p>	<p>Comment noted.</p>
0001685.22.2	<p>Regarding our aging population, this further highlights the need for more accessible communities in existing urban areas and as many studies show that as people age, they move to smaller homes with more pedestrian access and easy access to services.</p>	<p>Comment noted. Connect SoCal includes a variety of Implementation Strategies that can support the region's older adults. For example, the Plan includes 15-minute communities, which are places where people can access all of their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home. These communities allow older adults to age in place. The implementation of 15-minute communities is more important than ever as it will be vital to ensure a safe, accessible, and resilient future for the region's older adults.</p>
Submitted by	Friends of Harbors, Beaches and Parks	Submittal 0001686

ID	COMMENT	RESPONSE
0001686.01	<p>SECTION 3: THE PLAN SECTION 3.1 PURPOSE AND PLAN STRUCTURE</p> <p>On page 77, the key elements of the Plan are outlined. Regarding the Forecasted Regional Development Pattern, we encourage SCAG to take into account the post-pandemic trends in working and out-migration when forecasting where future jobs and housing are located.</p> <p>What expert projections and existing planning documents will be used?</p>	<p>The Demographics & Growth Forecast Technical Report provides further detail about expert projections and data used for the Connect SoCal growth forecast. Specifically, this report notes that, as has now been the case for 31 of the past 33 years, the number of Southern Californians leaving for other regions and states exceeds the number entering from other regions and states; nonetheless, population continued to increase through 2019. Section 3.1 describes how negative net domestic migration is a longstanding feature of Southern California’s demographics. Despite a temporary increase during COVID-19, per state Department of Finance Data (E-2 estimates) the level of “outflow” is in fact not growing and receded dramatically by mid-2023. In Los Angeles County in particular, population loss due to out-migration is at its lowest level since 2012. The technical report describes that a substantial portion of the recent population decline can instead be attributed to three principal factors related to COVID-19: a dramatic decrease in immigration due to border closures, excess deaths from the pandemic, and the temporary increase in “outflow.”</p> <p>The forecast’s theme of “Slower Growth, Steady Improvement” is intended to capture the comparatively modest population growth envisioned here in the context of regional planning by emphasizing the continued need for housing, supportive infrastructure, and the opportunity it presents for improved environmental protection.</p> <p>The plan document makes extensive use of American Community Survey (ACS) data (see, e.g. https://scag.ca.gov/post/american-community-survey-2022-data-release) and the Survey of Work Attitudes and Attributes (www.wfhresearch.com) to develop model and plan assumptions for future travel to the portion of jobs (assumed to be 36.7 percent, see page 32) which can be performed at home. More information can be found in the Demographics & Growth Forecast Technical Report section 3.3.2. In addition, SCAG is beginning to rely upon location-based services data and integrating the recently-released 2022 National Household Travel Survey into our ongoing planning and implementation processes.</p> <p>The locally-reviewed projections match the county and regional-level population, household, and employment totals developed by the expert and data-informed process described above, which account for migration and other demographic trends as well as the impact of work-from-home on region-level employment.</p>

ID	COMMENT	RESPONSE
0001686.02	<p>SECTION 3.1 PURPOSE AND PLAN STRUCTURE</p> <p>Again, it is surprising to see such low numbers (1,891 improved habitat acres) with such aspirational statements such as (pg. 79) "Resilience and Conservation: Advance the direction set forth in the SCAG Regional Council Resolution on Climate Change Action and Water Action. Consider opportunities for enhanced resilience and resource conservation—and develop recommendations on how Connect SoCal can support our communities in adapting to changing conditions or mitigating risks to become more resilient." This is especially puzzling in light of the acknowledgement that "SCAG is projecting just over half the level of population growth over this Plan's horizon as was anticipated in Connect SoCal 2020." (pg. 80)</p> <p>We believe the number of acres being improved must be re-evaluated and increased considerably.</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>
0001686.03	<p>SECTION 3.1 PURPOSE AND PLAN STRUCTURE</p> <p>On page 81, Table 3.1 compares past growth with predicted future growth. It's noted that total population growth in the past, 1990-2019, is lower in all counties for the upcoming years of 2019-2050.</p> <p>How was this comprehensive reduction in growth accounted for in the 2024 Plan?</p>	<p>Long-run regional population growth is expected to be substantially lower than in past periods—we are now planning for growth of roughly 2.06 million persons over the next thirty years compared to growth of roughly 4.19 million over the past thirty years. The future outlook is also substantially lower than Connect SoCal 2020's thirty-year projection horizon which anticipated growth of roughly 3.6 million people by 2045.</p> <p>This reduction flows through all parts of SCAG's forecasting, modeling, and performance measures—more detail is available in the Demographics and Growth Forecast Technical Report. One major implication is the expected reduction in the region's average household size from 2.99 in 2019 to 2.63 in 2050. This is due to an aging population and strong expected housing growth. However, it also means that more residents are likely to drive alone rather than with others and on its own can increase per-capita travel demand.</p>

ID	COMMENT	RESPONSE
0001686.04	<p>SECTION 3.1 PURPOSE AND PLAN STRUCTURE</p> <p>There is also a missed opportunity on page 85 to retrofit older neighborhoods that help reduce climate impacts. This could include HVAC systems, double or triple pane windows, cool roofs, clean energy systems, water recapture, etc.</p> <p>These upgrades are completely ignored in the Plan and should be incorporated, especially given that green (and sustainable) building is a stated policy of the Plan.</p>	<p>Section 6.2 in the Land Use and Communities Technical Report includes an Implementation Strategy to "Support implementing agencies' efforts to include climate-ready home-hardening strategies in housing construction to minimize the potential loss of housing units stemming from climate related hazards". To include retrofitting of existing structures, the strategy has been modified as such: "Support implementing agencies' efforts to include climate-ready home-hardening strategies in new construction as well as the retrofitting of existing structures to minimize the potential loss of housing units stemming from climate related hazards".</p>
0001686.05	<p>SECTION 3.2: THE HEART OF THE PLAN</p> <p>Fix-It-First Policy</p> <p>Outlined on page 91 of the Plan, "Fix-it-First" has been a guiding principle for prioritizing transportation funding in SCAG's RTPs for the last decade. The cost of rebuilding roadways is 14 times greater than preventative maintenance."</p> <p>FHBP supports this guiding principle for prioritizing transportation funding in SCAG's RTP because, as identified in the Plan, the cost of rebuilding roadways is vastly greater than preventative maintenance. The Fix-It-First policy should include planning for the inevitable cost and community impacts to those transportation assets that will be most impacted by sea level rise or damaged/destroyed by other climate disasters like wildfire or flooding.</p>	<p>Comment noted. The Connect SoCal 2024 Transportation Finance Technical Report includes discussion of future cost increases to system maintenance due to environmental shocks and stressors. Also see Caltrans' Statewide Climate Change Vulnerability Assessment, which was published in 2021. SCAG is currently working on a regional resilience framework to better understand the impacts of various shocks and stressors, including sea level rise, that impact the long-term sustainability for the built environment (including transportation infrastructure). This area is under future study for the 2028 plan and will inform future transportation needs forecasts. Further discussion of resiliency needs for transportation asset management is included in the Mobility Technical Report.</p>
0001686.06	<p>SECTION 3.2: THE HEART OF THE PLAN</p> <p>Priority Development Areas (PDAs)</p> <p>On page 100, the Plan identifies that PDAs account for 8.4% of the region's total land area, and implementation of SCAG's recommended growth strategies will help these areas accommodate 67% of forecasted household growth and 55% of forecasted employment growth between 2019 and 2050.</p> <p>Given the reduction in population and the increase of working from home, why can't these household and employment growth numbers increase? Of the 55% of employment growth, it can be assumed that 25% of it will be work that occurs from home rather than a commercial or office structure. Can't PDAs focus more square footage on high density housing growth, which also tangentially accommodates job growth? Examples already exist throughout the SCAG region and beyond for adaptive re-use of commercial buildings that accommodate housing in-situ. (See Santa Monica's Housing Element [https://www.santamonica.gov/media/Housing-Element-Update-2021-to-2029/Adopted%206th%20Cycle%20Housing%20Element%20(2021%20-%202029)%20%5BReduced%5D.pdf] and the City of LA's Adaptive Re-Use Program [https://www.ladbs.org/services/core-services/plan-check-permit/plan-check-permit-special-assistance/adaptive-reuse-projects].)</p>	<p>Despite the lower population projection compared to Connect SoCal 2020, household growth is anticipated to be comparable due to an anticipated drop in household size. Note that the PDA share is an improvement over last plan—see Figure 1 of the Land Use & Communities Technical Report. This improvement flows largely from the fact that the Forecasted Regional Development Pattern for this plan was developed prior to local jurisdiction review, presenting jurisdictions with a much more PDA-oriented growth pattern first, then and asking for their verification and correction. The previous practice was to present a linear growth trend (i.e. extrapolating past growth regimes), solicit review, then reshuffling growth into PDAs without local buy-in or a clear link to implementation.</p> <p>While the plan's long range assumption is that roughly 20-25 percent of workdays are from home, this is a significant, but not altogether earth-shattering increase from the 2045 assumption of 17 percent in the prior regional plan. As such many opportunities such as home-based work and reduction in need for retail and/or office space have been generally considered. As SCAG does not have direct land use authority, we look forward to continuing discussion on how to link these broader trends with implementation strategies at the neighborhood and site levels.</p>
0001686.07	<p>SECTION 3.2: THE HEART OF THE PLAN</p> <p>Priority Development Areas (PDAs)</p> <p>During the public engagement process in which FHBP served as a Community Partner, we heard from scores of people across the region who consistently identified their top concerns as: open space and recreation opportunities in their neighborhoods; limited reliable travel options other than driving; and climate change impacts.</p> <p>Increasing the percentage of overall growth in PDAs is critical in addressing the concerns of residents.</p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001686.08	<p>SECTION 3.2: THE HEART OF THE PLAN Priority Development Areas (PDAs)</p> <p>Also, because, as the Plan states, “the core transportation funding sources that our region has traditionally depended on are declining, volatile, and uncertain,” (pg. 46) it makes sense to focus development around existing public transportation infrastructure to ensure its usage and therefore help its sustainability and maintenance.</p> <p>Are there incentives or fees that can be included in a mitigation measure to encourage jurisdictions to ensure development occurs in PDAs thereby advancing land preservation goals and Fix-it-First transportation policies?</p>	<p>Comment noted. Local jurisdictions are the land use authorities in the region, and often work to implement growth strategies that focus development near existing or planned multimodal infrastructure. SCAG’s role to foster these actions, as detailed in Section 5 of the Land Use and Communities Technical Report, is to “support local jurisdictions and implementing agencies’ strategies to promote plans and projects within PDAs by providing awards, grants and technical assistance”. Comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-4 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001686.09	<p>SECTION 3.2: THE HEART OF THE PLAN Priority Development Areas (PDAs)</p> <p>If, as the Plan states, “only 7% of the region’s future household growth will be located in SOIs [Spheres of Influence] outside of incorporated city boundaries from 2019 to 2050,” (pg. 101) then why are only 1,891 acres being permanently protected as a result of this Plan as identified in the Land Use and Communities Appendix?</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation’s Farmland Mapping and Monitoring Program, as well as corrections to the Module’s inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG’s locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 “Natural and Agricultural Lands Preservation” Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>
0001686.10	<p>SECTION 3.2: THE HEART OF THE PLAN Priority Development Areas (PDAs)</p> <p>We support focusing housing in the PDA and avoiding or severely limiting greenfield development.</p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001686.11	<p>SECTION 3.2: THE HEART OF THE PLAN Green Region / Resource Areas (GRRAs)</p> <p>FHBP enthusiastically supports SCAG’s commitment to steer development away from GRRAs as highlighted both on page 103 and in the Land Use and Communities Technical Report, page 55, which shows a decrease in housing in GRRAs from 72.82% (2019) to 72.60% in 2050. As noted, these areas contain the most acute risks from climate change, would have the most environmental impacts, and cost the most in mitigation to develop due to the rich biodiversity and sensitive habitat types.</p>	Comment noted.
0001686.12	<p>SECTION 3.2: THE HEART OF THE PLAN Green Region / Resource Areas (GRRAs)</p> <p>On page 103, coastal inundation is highlighted as one of 10 topic areas of GRRAs. The Plan doesn’t fully address the impacts to infrastructure (transportation, utilities, broadband, cell towers, gas and sewer lines, etc.) from sea level rise.</p> <p>We note that, moving forward, SCAG will discourage new development within these flood zones, yet costs and community impacts from sea level rise to existing infrastructure must be addressed in the 2024 Plan. If the costs and community impacts are clearly defined by SCAG, it will further the goal of discouraging developers to pursue building in these zones.</p>	<p>Comment noted. Providing information to the public about land use, transportation, and other regional issues is an important part of SCAG’s mission. SCAG is continually adding new information to its publicly available databases, most notably the Regional Data Platform (RDP). As more high-quality data on the subject of climate impacts becomes available, SCAG will incorporate this data into future work products, plans, and programs for the region.</p>
0001686.13.1	<p>SECTION 3.2: THE HEART OF THE PLAN Green Region / Resource Areas (GRRAs)</p> <p>The Plan identifies Natural Community Conservation Plans and Habitat Conservation Plans (NCCP/HCP) as tools to allow economic activity. These Plans, in several instances (Orange County and Riverside County) are also directly tied to transportation. This should be acknowledged in the Plan on page 104.</p>	<p>The transportation mitigation benefits of NCCP/HCPs has been added to Section 3.2 of Connect SoCal 2024</p>
0001686.13.2	<p>Further, the document outlines “appropriate economic activity” related to NCCP/HCP. How is “appropriate” defined? Regional Conservation Investment Strategies (RCIS) were excluded from the Plan and we believe—since those offer another voluntary method to construct housing, transportation, and protect the environment—RCIS should be included. (See San Bernardino RCIS [https://storymaps.arcgis.com/stories/ca6c8dcf5e1241a98567a42568a69d3a].)</p>	<p>Appropriate economic activity related to Natural Community Conservation Plans/Habitat Conservation Plans (NCCP/HCP) would be activities that do not conflict with the natural resources and habitat areas identified for conservation. Regional Conservation Investment Strategies are an important mechanism for advance mitigation, and are now mentioned in Section 4.1 in the Land Use and Communities Technical Report.</p>

ID	COMMENT	RESPONSE
0001686.14	<p>SECTION 3.2: THE HEART OF THE PLAN Green Region / Resource Areas (GRRAs) Again Natural Lands are touted as a way to reduce climate impacts and GHG emissions (pg. 106), but with only 1,891 acres projected for improvement during the next 26 years, this projection doesn't match the stated policy objective.</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>
0001686.15	<p>SECTION 3.2: THE HEART OF THE PLAN Regional Strategic Investments Natural and Agricultural Lands Preservation In Chapter 3, page 109, a footnote states that the Regional Advance Mitigation Programs or RAMP was "previously a mitigation measure in the Connect SoCal 2020 PEIR (SMM BIO-2). In this cycle, the RAMP has been elevated to a plan feature, which reduces impacts."</p> <p>What is a "plan feature?" It isn't defined in the document. Does this mean that there will be implementation of the RAMP? Will SCAG create pilot programs and best practices for RAMP? We hope so and believe this next step will help streamline projects, permitting, and environmental protections.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-4 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001686.16	<p>SECTION 3.2: THE HEART OF THE PLAN Regional Strategic Investments Natural and Agricultural Lands Preservation</p> <p>While FHBP mainly focuses its work in Orange County, we have been able to relay our experiences with the successful RAMP under the Orange County Transportation Authority's (OCTA) Renewed Measure M (M2) to other county transportation agencies in California. Measure M2's Environmental Mitigation Program has permanently protected 1,300 acres and restored nearly 350 acres throughout Orange County. This innovative program enables 13 freeway projects to collectively mitigate impacts with large landscape-level mitigation, instead of small individual project-by-project mitigation efforts. It streamlines the environmental review and permitting process, allows projects to come in under budget, builds a positive working relationship with resource and permitting agencies (as well as conservation-focused non-profits), allows more thoughtful science-based conservation planning to occur, and is supported by many conservation and community organizations.</p> <p>The tremendous success of this Orange County program, in just one SCAG county, should inform SCAG to estimate much more than 1,891 acres to be improved under Connect SoCal for six counties. The SCAG habitat improvement numbers should be revisited.</p>	<p>Comment noted. SCAG recently adopted the Regional Advance Mitigation Program Policy Framework, which identifies how SCAG can support and expand advance mitigation programs in the region. This work is further supported by the Connect SoCal Implementation Strategy within the Land Use and Communities Technical Report as such: "[SCAG will] work with implementation agencies to support, establish, or supplement Regional Advance Mitigation Programs (RAMP) for regionally significant transportation projects that help mitigate environmental impacts and reduce per-capita Vehicle Miles Traveled (VMT), and provide enhanced data on mitigation opportunities through the Intergovernmental Review Process."</p> <p>With regard to habitat areas improved, SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use & Communities Technical Report. This includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-4 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001686.17	<p>SECTION 3.3: REGIONAL PLANNING POLICIES Mobility</p> <p>Policy 01 and 02 outlined on page 114 focus on SCAG's Fix-It-First objectives and transportation investments.</p> <p>Existing transportation assets that will be impacted by sea level rise should be included in these policy considerations.</p>	<p>Though Connect SoCal's policies already address climate resilience and by extension, sea level rise, their connection to transportation is updated as noted below.</p> <p>Transit and Multimodal Integration Policy: Create a resilient transit and rail system by preparing for emergencies and the impacts of extreme weather conditions. Revised to read: Create a resilient transportation system by preparing for emergencies and the impacts of climate change.</p> <p>Climate Resilience Policy: Support local and regional climate and hazard planning and implementation efforts. Revised to read: Support local and regional climate and hazard planning and implementation efforts for transportation, land use, and other factors.</p> <p>Connect SoCal's strategies also address the role of transportation in supporting climate resilience as highlighted in the following Transit and Multimodal Integration Strategy: Support community-led Complete Streets plans and projects, including those that take into account how to mitigate or adapt to climate change impacts (e.g., extreme heat).</p>

ID	COMMENT	RESPONSE
0001686.18	<p>SECTION 3.3: REGIONAL PLANNING POLICIES Communities Policies 32-34 on page 116 aim to promote new development where there is existing infrastructure.</p> <p>This policy is standard and must include some real implementation measures that include carrots and sticks.</p>	<p>Comment noted. In section 3.4, strategies are defined to help facilitate how these polices will be implemented. For example, in the "Communities" section of 3.4, SCAG will support local jurisdictions and implementing agencies' strategies to promote plans and projects within PDAs by providing awards, grants and technical assistance. This section also indicates that SCAG will partner with local jurisdictions to develop housing in areas with existing and planned infrastructure and availability of multimodal options, and where a critical mass of activity can promote location efficiency. Further examples of implementation strategies can be found in section 6.4 of the Land Use and Communities Technical Report.</p>
0001686.19	<p>SECTION 3.3: REGIONAL PLANNING POLICIES Communities The very areas with high homelessness are the same areas with high percentages of substandard housing. Please connect the intent of Policy 41 on page 117 with the existence of substandard housing.</p> <p>The Housing Technical Report on page 10 identifies 80,909 units lacking kitchen facilities and 22,822 units lacking complete plumbing. This provides an enormous opportunity to meet housing demands and elevate these tenants' dignity, health, and wellbeing.</p> <p>Can SCAG implement and promote policies that bring incomplete facilities and substandard housing to livable standards, thereby providing additional housing without the need for additional new infrastructure or added GRRRA development?</p>	<p>Comment noted. The retrofitting and improvement of substandard housing can be a part of local efforts to preserve affordable housing. While SCAG does not have control over housing units, it will continue to support local policies that support the preservation of affordable housing.</p>
0001686.20	<p>SECTION 3.3: REGIONAL PLANNING POLICIES Communities Policy 43 on page 117 says SCAG will support 15-Minute Communities that improve "quality of life, public health, mobility, sustainability, resilience, and economic vitality."</p> <p>FHBP recommends, as part of the policies related to 15-Minute Communities, that parks and recreational opportunities be included in the concept because neighborhood parks meet all the objectives listed as part of Policy 43. Furthermore, neighborhood park capacity, specifically a lack of capacity throughout the region, was identified during SCAG's public outreach effort. While large swaths of open space are ideal for carbon sequestration, vehicle-accessed recreation, and habitat management, neighborhood parks are critical for public health. This is especially true in areas of very low and low incomes residents. Residents with lower incomes may not have vehicles or choose to not have vehicles due to any number of factors. This reduces their ability to travel to further away open space areas, making local parks more important. Further, there are ways to reprogram local streets (See CicLAVia [https://www.ciclavia.org/] and FHBP's Urban Park Study [https://www.fhbp.org/resources/studies-reports/urban-park-study/].)</p>	<p>Comment noted. In section 6.4.2 of the Land Use and Communities Technical Report, 15-Minute Communities is discussed in depth. In the narrative, "access to parks" and "improved access to parks" are identified as positive attributes in sustaining and promoting public health.</p>
0001686.21	<p>SECTION 3.3: REGIONAL PLANNING POLICIES Communities 15-Minute Communities must include policies encouraging the establishment of urban growth boundaries around these areas, which would assist in the goals of Connect SoCal 2024.</p> <p>A local example, but with a slightly different approach that SCAG often references, is Ventura's Save Open Space and Agricultural Resources (SOAR) initiative. In addition, in communities such as Marina, California, which is a coastal middle-class city and has many similarities to SCAG's region, an urban growth boundary forces development inside the boundary. That city has shown incredible progress in higher-density housing, transit usage, pedestrian and bike access, and increased sales tax revenues. (See Marina's Urban Growth Boundary [https://cityofmarina.org/1012/Measure-Q-Urban-Growth-Boundary] measure, which was first approved in 2000 and later re-approved by voters in 2022).</p>	<p>15-minute communities do not include fixed boundaries and are instead intended to support existing and established communities across the region to deploy a series of strategies that increase access to important destinations and mobility options. The program development around this planning concept will ensure alignment with Connect SoCal and planning activities that support a reduction in VMT.</p>

ID	COMMENT	RESPONSE
0001686.22	<p>SECTION 3.3: REGIONAL PLANNING POLICIES Environment On page 118, Policy 48 states, "Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption, and promote resilience."</p> <p>This policy is unclear. Is SCAG referring to Low Impact Development (LID), Leadership in Energy and Environmental Design (LEED) standards or something else? FHBP urges more specificity to be clear on what best practices are being recommended.</p>	<p>Comment noted. In section 3.4 Plan Fulfillment, under the Environment section, SCAG implementation strategies include: Monitor and pursue funding opportunities that can foster sustainable and equitable land use and development across the SCAG region. Explore the feasibility of creating a pilot grant program to support local planning and/or implementation. As well as a leadership role in research the availability of resources that can support the development of water and energy-efficient building practices, including green infrastructure. Many additional Implementation Strategies directly or indirectly relate to and support this policy as well.</p>
0001686.23	<p>SECTION 3.3: REGIONAL PLANNING POLICIES Environment Policy 49 (pg. 118) iterates the implementation of the Forecasted Regional Development Patterns of Connect SoCal 2024.</p> <p>Please explain if household, employment, and population projections, reviewed and refined by jurisdictions, account for the slower population growth projected and the work-from-home scenarios.</p>	<p>The Demographics & Growth Forecast Technical Report provides further detail about expert projections and data used for the Connect SoCal growth forecast. Specifically, this report notes that, as has now been the case for 31 of the past 33 years, the number of Southern Californians leaving for other regions and states exceeds the number entering from other regions and states; nonetheless, population continued to increase through 2019. Section 3.1 describes how negative net domestic migration is a longstanding feature of Southern California's demographics. Despite a temporary increase during COVID-19, per state Department of Finance Data (E-2 estimates) the level of "outflow" is in fact not growing and receded dramatically by mid-2023. In Los Angeles County in particular, population loss due to out-migration is at its lowest level since 2012. The technical report describes that a substantial portion of the recent population decline can instead be attributed to three principal factors related to COVID-19: a dramatic decrease in immigration due to border closures, excess deaths from the pandemic, and the temporary increase in "outflow."</p> <p>The forecast's theme of "Slower Growth, Steady Improvement" is intended to capture the comparatively modest population growth envisioned here in the context of regional planning by emphasizing the continued need for housing, supportive infrastructure, and the opportunity it presents for improved environmental protection.</p> <p>The plan document makes extensive use of American Community Survey (ACS) data (see, e.g. https://scag.ca.gov/post/american-community-survey-2022-data-release) and the Survey of Work Attitudes and Attributes (www.wfhresearch.com) to develop model and plan assumptions for future travel to the portion of jobs (assumed to be 36.7 percent, see page 32) which can be performed at home. More information can be found in the Demographics & Growth Forecast Technical Report section 3.3.2. In addition, SCAG is beginning to rely upon location-based services data and integrating the recently-released 2022 National Household Travel Survey into our ongoing planning and implementation processes.</p> <p>The locally-reviewed projections match the county and regional-level population, household, and employment totals developed by the expert and data-informed process described above, which account for migration and other demographic trends as well as the impact of work-from-home on region-level employment.</p>
0001686.24	<p>SECTION 3.3: REGIONAL PLANNING POLICIES Environment On page 118, Policy 50 directs supporting communities to use sustainable development practices.</p> <p>Does the Plan indicate the ideal practices to be supported? What practices can jurisdictions look to as examples?</p>	<p>Comment noted. In section 3.4 Plan Fulfillment of the Main Book, under the Environment section, SCAG implementation strategies include: Monitor and pursue funding opportunities that can foster sustainable and equitable land use and development across the SCAG region, explore the feasibility of creating a pilot grant program to support local planning and/or implementation, and undertake a leadership role to research the availability of resources that can support the development of water and energy-efficient building practices, including green infrastructure.</p> <p>Additionally, in section 6 of the Land Use and Communities Technical Report, SCAG identifies several components to encouraging sustainable development practices.</p>

ID	COMMENT	RESPONSE
0001686.25	<p>SECTION 3.3: REGIONAL PLANNING POLICIES Environment Policy 56 on page 118 says, "Promote equitable use of and access to clean transportation technologies so that all may benefit from them."</p> <p>Please explain. How will the SCAG Plan improve equitable use and access?</p>	<p>Comment noted. Chapter 3 identifies Implementation Strategies that advance the Regional Planning Policies. For Clean Transportation, SCAG proposes to Investigate opportunities to install charging stations that can be used by multi-unit dwellers that don't have the same opportunities for charging as single-family homeowners. SCAG also proposes to assist local jurisdictions in developing an incentive program to further adoption of zero-emission passenger vehicles. Such a program could be designed to focus on households in Priority Equity Communities.</p> <p>Additionally, SCAG has formulated a set of Technology Guiding Principles, reflected in the Technology Integration policies detailed on page 115, that are designed to align with Connect SoCal 2024 and SCAG's ongoing programs. These principles serve as a reference for local agencies and operators, demonstrating alignment with Connect SoCal in their quest for state or federal resources. Notably, these guiding principles place a strong emphasis on equity, positioning it as the foremost principle.</p>
Submitted by	Friends of Harbors, Beaches and Parks	Submittal 0001687
0001687.01	<p>SECTION 3.3: REGIONAL PLANNING POLICIES Environment On page 119, Policy 59 correctly identifies that the economic benefits of natural and agricultural lands must be prioritized. SCAG continues to overlook the incredible economic benefits of open space and recreation. SCAG can examine any area in California and beyond where a National Park or a National Monument or local open space area was opened to the public, and see the immediate increase in sales tax revenue in the stores, markets, restaurants, and EV-charging and gas stations, within a few mile radius of the park.</p> <p>This specific economic impact of recreation must be considered in the Plan. Additionally, please take into account the economic assets related to viewsheds that contain these types of properties. (See The Trust for Public Land's Economic Benefits of Parks Report [https://www.tpl.org/resource/measuring-economic-value-city-park-system], the Lincoln Institute's Economic Value of Open Space report [https://www.lincolninst.edu/publications/articles/economic-value-open-space], and the Institute for Local Government's Economic Benefits of Open Space, Recreation Facilities, and Walkable Community Design Report [https://www.ca-ilg.org/sites/main/files/file-attachments/resources_synthesis_shoup-ewing_march2010.pdf?1441322910].)</p>	<p>Comment noted. The economic impacts of travel, which includes recreation sites, are included in Travel and Tourism Technical Report. SCAG does not currently have an economic analysis of open space and recreation, but recently received a grant from the Department of Conservation to develop a Natural and Agricultural Lands Economic Benefit Study that includes an analysis of the economic, public health, and resilience benefits of the key environmental services provided by natural lands and agricultural lands in Southern California. Recreation benefits will be a component of the overall analysis in this effort.</p>
0001687.02.1	<p>SECTION 3.3: REGIONAL PLANNING POLICIES Environment Policy 62 on page 119 says to "encourage the protection and restoration of wildlife corridors." Animal corridors are a strong indicator of habitat health and regional environmental health. Given that, it's unclear what implementation measures will encourage the development and protection of animal corridors. Please explain how animal corridors will be encouraged and implemented, and how success is measured by SCAG.</p>	<p>Strategies to implement Policy 62 can be found under Natural and Agricultural Lands Preservation on page 132 of the Plan. Specific approaches will be determined during Plan implementation, after it is adopted. Stakeholder input will play an important role and SCAG encourages your organization to participate in this process.</p>
0001687.02.2	<p>Further, it is unclear from this language what animal classifications are included in the term "wildlife corridors." SCAG should be clear that this includes the entire suite of species from amphibians to reptiles and birds to mammals—everything that utilizes movement corridors (air, land, water, etc.) is covered under this policy.</p>	<p>Comment noted. SCAG does not intend to preclude any species from inclusion in wildlife corridors. The Plan uses the data from the California Department of Fish and Wildlife's Habitat Connectivity Project to identify wildlife corridors for the Green Region Resource Areas. This coarse-scale map is based primarily on the concept of ecological integrity, rather than the needs of particular species. For more information, please see section 5.3 of the Land Use and Communities Technical Report.</p>

ID	COMMENT	RESPONSE
0001687.03	<p>Section 3.4: Plan Fulfillment Strategies System Preservation and Resilience On page 124, "Collaborate to work toward a regional asset management approach."</p> <p>SCAG is the partner on this effort, and given the critical nature of asset management, we'd like further details regarding the strategies and benchmarks of the partnerships.</p>	<p>Comment noted. Please see the Mobility Technical Report for additional information on the region's transit asset management efforts and the California Transportation Asset Management Plan that SCAG collaborated on. Updates on this implementation strategy will be provided to the SCAG Transportation Committee as key milestones are met.</p>
0001687.04	<p>Section 3.4: Plan Fulfillment Strategies Complete Streets On page 124, "Develop a Complete Streets network and integrate Complete Streets into regional policies and plans, including consideration of their impacts on equity areas."</p> <p>SCAG is the lead on this strategy. What's the timeline for creating the network and the method for ensuring the integration into individual jurisdictions' policy documents?</p>	<p>Comment noted. SCAG will lead this strategy by working with local jurisdictions, transit/rail authorities, and County Transportation Commissions to integrate locally-developed Complete Streets networks into a regional network that informs regional policies and plans, including consideration of their impacts on equity areas. The Complete Streets network would be a living network as partners update their plans, policies, and/or designated networks. SCAG anticipates some of this work will occur through its Safe Streets and Roads for All-funded Safety Action Plan and potentially through another grant-funded Main Streets project.</p>
0001687.05	<p>Section 3.4: Plan Fulfillment Strategies Transportation Systems Management On page 126, "Evaluate projects submitted for inclusion in RTP/SCS and Federal Transportation Improvement Program (FTIP) for progress in achieving travel-time reliability in the SCAG region."</p> <p>What is meant by "progress?" Will SCAG review past projects for efficiency in tandem with new projects' reviews?</p>	<p>As required by federal regulations, beginning with MAP-21 (2012), SCAG has collected federal Performance Measure input on system performance related to travel-time reliability for projects programmed in the FTIP. The collected data is analyzed to determine how the SCAG region is performing and where it stands in achieving its regional goals. Please see Section VII, Performance Measures in the 2023 FTIP through the following website link for the results of this assessment. https://scag.ca.gov/sites/main/files/file-attachments/f2023-ftip-technical-appendix.pdf?1664401516</p>
0001687.06	<p>Section 3.4: Plan Fulfillment Strategies Funding the System / User Pricing On page 128, it states SCAG will lead "Study and pilot transportation user-fee programs and mitigation measures that increase equitable mobility."</p> <p>Where will SCAG host the pilot programs and will there be a variety of locations? What are the objectives and desired outcomes of the study? How will equity be centered in this policy so that no new burdens are placed on very low and low income residents?</p>	<p>Comment noted. Connect SoCal acknowledges that work needs to be done to support an equitable transition to a user fee system. SCAG's key guiding principles for financial strategies include:</p> <ul style="list-style-type: none"> -Establishing a user-based system that better reflects the true cost of transportation, provides firewall protection for new and existing transportation funds, and ensures an equitable distribution of costs and benefits. -Pursue funding tools that promote access to opportunity and support economic development through innovative mobility programs. <p>SCAG is currently engaged in studies that will inform the structure and scope of future pilot efforts.</p>
0001687.07	<p>Section 3.4: Plan Fulfillment Strategies Priority Development Areas On page 129, SCAG is listed as a partner to "Develop housing in areas with existing and planned infrastructure and availability of multimodal options, and where a critical mass of activity can promote location efficiency."</p> <p>How does this strategy relate to supporting and developing 15-Minute Communities?</p>	<p>Comment noted. Both examples are aligned and are supportive of one another. The highlighted PDA implementation strategy is referring to communities that may have more intensive in development patterns (critical mass of location efficiency). While 15-minute communities may be applicable in the above context, they are also applicable in communities that have less intensive patterns but are still important destination within their communities and have the opportunity to support equitable and resilient growth. PDAs work hand-in-hand with 15-minute community concepts outlined in section 6 of the Land Use and Communities technical report to promote sustainable development for location efficiency.</p>

ID	COMMENT	RESPONSE
0001687.08	<p>Section 3.4: Plan Fulfillment Strategies 15-Minute Communities</p> <p>On page 129, SCAG is listed as the lead to “Develop technical-assistance resources and research that support 15-Minute Communities across the SCAG region by deploying strategies that include, but are not limited to, redeveloping underutilized properties and increasing access to neighborhood amenities, open space and urban greening, job centers, and multimodal mobility options.”</p> <p>How will this strategy be implemented and what technical-assistance resources will be provided? Does this policy link somehow to the Greenprint? How can this relate to fixing existing substandard housing totaling over 100,000 units, as identified in the Housing Technical Report?</p>	<p>Commented noted. The technical assistance proposed under 15-minute communities may include resources that highlight best practices and guides for communities across the region and may include a potential grant program that could fund jurisdictions pursuing 15-minute communities across the region.</p> <p>The Greenprint can serve as an information resource and can also identify existing neighborhood amenities, such as parks and open space, to help inform implementation of 15-Minute Communities at the local level.</p> <p>The retrofitting and improvement of substandard housing can be a part of local efforts to preserve affordable housing. While SCAG does not have control over housing units, it will continue to support local policies that support the preservation of affordable housing.</p>
0001687.09	<p>Section 3.4: Plan Fulfillment Strategies 15-Minute Communities</p> <p>On page 129, SCAG is to act as a partner to “Identify and pursue funding programs and partnerships for local jurisdictions across the region to realize 15-Minute Communities.”</p> <p>What will the parameters be when identifying funding and program development?</p>	<p>Comment noted. SCAG will explicitly seek out funding programs that reinforce plans and policies that align with 15-minute communities and that have broad applicability across the diversity of SCAG’s communities. Program development will be informed by stakeholder engagement and SCAGs policy committees and Regional Council.</p>
0001687.10	<p>Section 3.4: Plan Fulfillment Strategies Sustainable Development</p> <p>On page 131, SCAG is listed as the lead to “Monitor and pursue funding opportunities that can foster sustainable and equitable land use and development across the SCAG region. Explore the feasibility of creating a pilot grant program to support local planning and/or implementation.”</p> <p>We hope that existing research and implementation measures in other jurisdictions are used as examples so SCAG isn’t reinventing the wheel. Also, what sustainable development practices is SCAG focused on?</p>	<p>Comment noted. Over the past ten years, SCAG has utilized state and federal funding programs to help implement and foster sustainable and equitable land use and development throughout the region. From the Sustainable Communities Program, to the Regional Early Action Planning program, SCAG has created and will continue to create guidelines for programs that align with the Plans goals of sustainable and equitable land use and development. Additionally, SCAG is in the process of developing tools to showcase previous projects and plans that have been funded through various SCAG grant programs. It is the intent of the tool to highlight best practices.</p> <p>The referenced implementation strategy, under the Sustainable Development category, may include many of the characteristics identified under Complete Communities in the Land Use Technical Report including diversity of land uses, a variety of mobility options, and sustainable infrastructure—please see section 6.4.1 of the Land Use Technical Report for additional details.</p>
0001687.11	<p>Section 5.1 Performance Outcomes Performance Monitoring</p> <p>On page 176, the Plan explains that projects’ performance regarding the regional goals established by Connect SoCal are monitored using the FTIP. While measuring projects’ performance against Connect SoCal’s Plan objectives after projects are built is critical for future planning, what does the ongoing monitoring look like and how is this reported to the public?</p>	<p>Comment noted. The on-going monitoring of Connect SoCal performance is essential for ensuring that the region remains on track toward achievement of the goals of the Plan. In developing Connect SoCal, SCAG identified a comprehensive set of quantitatively defined performance metrics that are intended to provide insights into regional performance relative to Plan goals over time. The on-going performance measures are monitored by SCAG through use of observed data from a variety of data sources. SCAG is working toward development of enhanced tools for tracking and reporting on-going regional performance over time.</p>
0001687.12	<p>Section 5.1 Performance Outcomes Plan Performance</p> <p>Given that the baseline is 2019, how are new conditions post-pandemic considered, such as working from home and fewer vehicle miles traveled, in the performance profile starting on page 178?</p>	<p>Comment noted. Usually the comparative base year used for development of the RTP/SCS is the initial year of the previous Plan, which would be 2020 in the case of Connect SoCal 2024. The reason 2019 was selected for the new Plan was to avoid comparison to the anomalous transportation system behavior experienced during the initial year of the pandemic. As the longer term transportation impacts of the pandemic become better understood, SCAG will incorporate those changes into our planning models.</p>

ID	COMMENT	RESPONSE
0001687.13	<p>Section 5.1 Performance Outcomes Plan Performance Table 5.1, Performance Measures, outlines baseline conditions, conditions with Connect SoCal, and the trend. On page 181, the table lists: "Park Accessibility" with two performance measures: 1. "Share of population able to reach a park within 30 minutes by auto 2. Share of population able to reach a park within 30 minutes by transit"</p> <p>This vehicle-centric focus is antithetical to the concept of a 15-Minute Community because it urges people to continue to use greenhouse gas intensive methods to access parks. SCAG should focus on a 15-Minute walk or ride to a park, meaning SCAG must develop policies encouraging neighborhood parks. The Trust for Public Land has a tool that calculates a community's "ParkScore," [https://www.tpl.org/parkscore] which provides on-the-ground information about park equity for communities and includes the greater SCAG region. These performance measures should be redrafted to focus on pedestrian-oriented access to parks.</p>	<p>Comment noted. SCAG agrees with your assessment that improved pedestrian access to parks and open spaces should be encouraged. The ability of people to access parklands near their place of residence not only reduces reliance on vehicular travel, but also improves public health outcomes. Thank you for sharing the 'ParkScore' tool provided by the Trust for Public Lands.</p>
0001687.14	<p>Section 5.2: Regional Benefits In Table 5.2 there are numerous performance measures related to mobility, especially vehicle-related mobility. Does the trend take into account new post-pandemic trends for "Person Hours of Delay by Facility Type?" The reductions are averaging 22% and it's unclear if these impressive reductions are from projects and maintenance alone. How will this performance be measured?</p>	<p>Comment noted. The comparative base year selected for the performance assessment of Connect SoCal 2024 was 2019 specifically to avoid pandemic-related transportation system performance anomalies experienced during 2020. The Connect SoCal assessment process used the base year (2019) to compare forecasted regional performance in the horizon year of 2050 both with, and without, implementation of the Plan. Several of the mobility measures, including peak hour excessive delay and truck travel time delay, are included in the federal transportation performance management program which is monitored and reported on a 4-year cycle. The next federal system performance reporting cycle begins in 2026.</p>

ID	COMMENT	RESPONSE
0001687.15	<p>Section 5.2: Regional Benefits Page 178, and again on page 181 and 184, identifies Rural Land Consumption (also called Greenfield) as being reduced 48% from the baseline.</p> <p>If 37 square miles won't be developed—again why only 1,891 acres of improved habitat? We don't feel the connections are being made between the policy performance and the on-the-ground situation.</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>
0001687.16	<p>Section 5.2: Regional Benefits On page 184, Table 5.2 identifies a savings of 7.5% or \$2.8 billion when comparing the 2050 baseline with Connect SoCal relative to local infrastructure and services costs.</p> <p>Does this figure account for infrastructure costs associated with impacts due to sea level rise?</p>	<p>Comment noted. Since the Connect SoCal 2024 performance assessment process models expected regional performance in the year 2050 both with and without implementation of the Plan, the local infrastructure cost savings attributed to Connect SoCal considers only the projects, programs, and strategies included in the Plan that would not otherwise be implemented, including infrastructure investments related specifically to sea level rise.</p>

ID	COMMENT	RESPONSE
0001687.17	<p>Section 5.2: Regional Benefits</p> <p>The same table on page 184 identifies a paltry savings of 0.4% when comparing building water use between the 2050 baseline and the Connect SoCal Plan.</p> <p>Please explain why the Connect SoCal Plan's policies aren't realizing larger water savings for residential and commercial buildings. Are there additional policies and mitigation measures that can be included?</p>	<p>SCAG has updated the results for the Scenario Planning Model, which are identified in Table 3 of the Land Use and Communities Technical Report. This update yields improvements in some projected outcomes from Connect SoCal 2024 that result from SCAG's locally informed Forecasted Regional Development Pattern, which impacts anticipated water use for residential and commercial structures. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. These projected outcomes do not reflect the potential benefits of Connect SoCal 2024 Regional Strategic Investments, Regional Planning Policies, or Implementation Strategies that are designed to fill the gap between what we can achieve from the bottom-up process of the locally informed Forecasted Regional Development Pattern, as well as transportation projects provided by each County Transportation Commission in the region, and what the region must achieve to meet performance requirements or reach Connect SoCal's 2024 goals.</p> <p>The Scenario Planning Model's Water Module calculates indoor and outdoor water use for residential and commercial buildings. Indoor water use is estimated per-capita, while outdoor water use is estimated based on irrigated area. Indoor and outdoor water use was first calculated according to the following baseline rates and then adjusted to account for the application of efficiency and conservation practices into the future. Outdoor water use for residential and commercial buildings was calculated based on assumptions about the amount of irrigated area, and per-acre watering needs based on climate. The amount of outdoor irrigated area per residential unit varies according to assumptions about lot size, hardscape percentage, and irrigated percentage which are grounded in building type studies. Per-acre landscape irrigation requirements were derived from annual reference evapotranspiration (ETo) values from California Irrigation Management Information System.</p> <p>Model results for the 2019 base year at the water district level were calibrated using 2019 monthly water use reports submitted by urban water utilities with more than 3,000 customers. For those submitted by urban water utilities areas served by multiple providers, average values were used. For future scenarios, water use was first calculated according to baseline rates and then adjusted to account for the application of anticipated water efficiency and conservation practices into the future.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-4 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001687.18	<p>Section 5.2: Regional Benefits</p> <p>On page 193, the performance measure for Neighborhood Change and Displacement doesn't purport to analyze the impact from infrastructure improvements and gentrification. SCAG already identified on page 19 of the Housing Technical Report that, "Displacement pressures can be further exacerbated by major public investments, such as improved infrastructure and amenities. However, in some instances, these major infrastructure investments may come first, and gentrification follows."</p> <p>Please include a performance measure and summary of analysis to study infrastructure investments' impacts on gentrification pressures.</p>	<p>Comment noted. Section 7.2 of the Equity Analysis Technical Report discusses the potential for public investments, like improvements to transportation infrastructure, to contribute to neighborhood change and displacement, though it does not include a specific focus on the impacts of major infrastructure investments. This performance measure has evolved from previous Regional Transportation Plans and staff will continue to look for ways to expand and improve on the analysis, where possible, including assessment of the impact of infrastructure investment on gentrification pressures.</p>

Submitted by

Friends of Harbors, Beaches and Parks

Submittal

0001688

ID	COMMENT	RESPONSE
0001688.01	<p>Section 1 (Executive Summary)</p> <p>On page 2, the Report states, "SPM [Scenario Planning Model] results generally indicate that Connect SoCal 2024 is superior to the Trend/Baseline forecast—with highlights including nearly twice as much net growth in multi-family housing, more housing unit growth in PDAs, and reduced water and energy use in commercial and residential buildings." Based on the anticipated loss of 48,000+ acres of natural lands and 8,100+ acres of farmland, please explain how Connect SoCal is superior to the baseline forecast. This is especially important in that Connect SoCal includes the environment as one of four pillars of the document.</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>
0001688.02	<p>Section 2.4 (California State Wildlife Action Plan (SWAP))</p> <p>The most recent SWAP is from 2015, as indicated on page 6. It may be a comprehensive document, but it's outdated. New species were added in the last eight years and others are being considered for addition to the California/Federal Endangered Species List. We suggest that SWAP information be supplemented with new data and information available from the California Department of Fish and Wildlife and/or US Fish and Wildlife Service for species, critical habitat, and other species monitoring in the SCAG region. The Program Environmental Impact Report uses much more current data. Why not this Technical Report?</p>	<p>Comment noted. The Land Use and Communities Technical Report cites the SWAP as a minimum requirement for integration into Connect SoCal. SCAG engaged with jurisdictions in 2022 to review the initial growth forecast and provided maps with several different wildlife and habitat data layers, both individually and grouped by the themes, to help inform that feedback. These are referred to collectively as Green Region Resource Areas (GRRAs) in the Land Use & Communities Technical Report. Data layers include the California Department of Fish and Wildlife's California Natural Diversity Database for rare, threatened and endangered species and plants, and the following datasets to define sensitive habitat areas: US Fish and Wildlife Services National Wetlands Inventory Data; California Department of Fish and Wildlife Areas of Conservation Emphasis; and the California Department of Fish and Wildlife Habitat Connectivity Project. Some data layers may differ from those utilized for analysis in the PEIR as the GRRAs were representative of data available in 2022.</p>

ID	COMMENT	RESPONSE
0001688.03	<p>Section 2.5 (SCAG SCS Land Use Priorities)</p> <p>As outlined in Section 2.5.2, SCAG's Water Resolution, states "In October 2022, SCAG's Regional Council adopted its Water Action Resolution (Resolution No. 22-647-3)." The Resolution calls on SCAG to, "identify, recommend and integrate into Connect SoCal 2024 policies and strategies to align investments in water infrastructure with housing needs and the adopted growth forecast and development pattern. Connect SoCal 2024's water resilience Regional Planning Policies and Implementation Strategies that fulfill Regional Council's direction are included in Section 6.2.2." As FHBP identified in our letter on the Plan, Table 5.2 on page 184 of the Plan projects very minimal water usage decreases after the Plan is implemented. Seventy percent of water usage by a single-family home is landscaping, providing a huge opportunity to achieve greater drinking water resiliency by eliminating the use of drinking water for landscaping purposes. Please include innovative priorities, programs, and policies for reducing the use of drinking water for residential landscaping watering.</p>	<p>Water conservation for landscaping is addressed in Section 6.2.2 Water Resilience in the Land Use and Communities Technical Report, specifically Connect SoCal's regional planning strategy of "Landscaping with native and drought-tolerant plants". Additional text in this section is added to address water consumption for single-family homes related to outdoor uses.</p>
0001688.04	<p>Section 2.5.3 (Pathways to 30x30 Strategy)</p> <p>FHBP is inspired by SCAG's connection of the Connect SoCal Plan with Governor Newsom's signed Executive Order N-82-20 that aims to combat the climate and biodiversity crises by conserving 30% of California's land and coastal waters by 2030 (called 30x30). As staff knows, this Executive Order was recently codified in Senate Bill 337 (Min-D). Please incorporate SB 337 into the Connect SoCal Plan / Land Use & Communities Technical Report since 30x30 is codified now.</p>	<p>Comment noted. Section 2.5.3 in the Land Use and Communities Technical Report includes mention of SB 377 as such: "In October 2020, Governor Newsom signed Executive Order N-82-20, which aims to combat the biodiversity and climate crises by conserving at least 30 percent of California's land and coastal waters by the year 2030. This action was subsequently codified into California State Law through SB 337 (Min) in October 2023. This initiative is part of an international conservation movement, with multiple countries establishing their own 30x30 commitments."</p>
0001688.05	<p>Section 3.1 (Community and Land Use Patterns)</p> <p>The Report states on page 9, "Similarly, the SCAG region has incredible diversity in its built environment and land use patterns. This diversity is reflected in how people experience their communities and how that influences overall quality of life. Complete communities are important considerations in land use planning as they are places that meet peoples' essential needs (housing, mobility), the provision of goods and services, recreation and respite, and overall access to opportunity." The notion of communities meeting people's needs is critical and underscores many of FHBP's overall comments and suggestions for the Plan. We agree, that's why we continue to suggest incorporating topics such as: focusing development in existing communities, called Priority Development Areas (PDAs), to enhance services and infrastructure; ensure communities have park access via walking or riding, not simply driving; continue to discourage development in Green Region Resource Areas (GRRA) so those lands can be used to meet the 30x30 goals; and use resources wisely and continue to push for greater conservation of all resources including farmlands and water.</p> <p>The Report states, "Despite this, the underlying historical development pattern has generally resulted in Southern California remaining very automobile dependent—with 76 percent of work commutes in 2019 coming through single-occupant vehicles." (pg. 19) We suggest using more current numbers—especially in light of the new remote work / work-from-home scenarios, which account for greater work-related trip reduction.</p>	<p>Comment noted. We have updated this section with recently-released 2022 American Community Survey data.</p>

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0001688.06	<p>Section 3.2 (Natural and Farmlands)</p> <p>FHBP appreciates that this section mentions the enormous economic value that farmlands add to the community, but the economic benefits realized by natural lands and recreation is ignored. Please consider including these benefits. See also the soon-to-be submitted Natural & Farmlands Coalition Letter for reports/resources to bolster this section.</p> <p>On page 10, the Report states, "With abundant desert, mountain, and coastal habitats, some of the highest concentrations of native plant and animal species on the planet are found within our region." It isn't just the types of habitats and numbers of flora and fauna—it is also that these species are found nowhere else on the planet—i.e., they are endemic species. So, it isn't just quantity, it is also about quality. With the anticipated loss of over 48,000 acres, this equates to a lot of endemic species being lost permanently from the planet. This should be addressed in the report.</p> <p>Page 11 of the Report states, "Household and employment growth that degrades or develops vital habitats reduces the environmental services they provide us that are crucial to our regional economy, health, and overall quality of life." FHBP suggests weaving in a land ethic within this document, rather than making the document completely anthropocentric. The document treats the environment as separate from humanity, when in fact it is intertwined. As noted on the Aldo Leopold Foundation website, "... the relationships between people and land are intertwined: care for people cannot be separated from care for the land." The landscape, its ecosystem services, plants, animals, the web of life, and intrinsic value should be intertwined within this document and recognized for its contributions to human existence (e.g., without pollinators, crops wouldn't grow—without crops, humans don't have food and wouldn't survive).</p>	<p>Additional discussion on the economic benefits of natural lands and recreation has been added to Connect SoCal in the Land Use and Communities Technical Report Section 3.2, as well as the connection between humans and natural lands. Also, SCAG has received a Sustainable Agricultural Lands Conservation planning grant to study the economic and fiscal benefits of natural and farm lands.</p>
0001688.07	<p>Section 3.3 (Climate Hazards)</p> <p>As with the Plan, risks from flood events and impacts of sea level rise are identified (pg. 17), yet the issue isn't addressed in a deeper way via policy objectives and mitigation. Sea level rise is already causing massive damage to existing infrastructure in coastal communities, while flooding is also wiping infrastructure off the map. SCAG must include sea level rise, coastal erosion, and flooding impacts to all forms of infrastructure in policy objectives, project infrastructure maintenance costs, and mitigation measures in the Land Use and Communities Technical Report.</p> <p>Further, the loss of actual infrastructure (powerlines, cell towers, roads, etc.) as an impact of wildfires and landslides should be captured in this section.</p> <p>Preparation for climate hazards (such as high heat days coupled with Santa Ana winds) in the form of Public Safety Power Shutoffs should also be covered. With these shutoffs that are implemented by electric utilities, there is potential for loss of perishable food, work time, ability to travel to and from home/work/school, stay cool, and, if you are disabled, to stay alive if dependent on life saving equipment. These preparatory systems should be addressed as an impact to Southland residents.</p>	<p>Comment noted. Additional discussion on this topic has been added to Sections 4.2 and 6.2 in the Land Use and Communities Technical Report.</p>

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0001688.08	<p>Section 4.1 (Social, Economic, Natural and Built Environment Challenges)</p> <p>Many cities are adopting ordinances to cover short-term rentals because of neighborhood impacts. That said, if homes are being rented for less than 30-day stays, this is housing that could be made available to the community permanently. The housing impacts of short-term rentals and even foreign-owned investments should be acknowledged in the document.</p> <p>This section appropriately identifies the rapidly growing unhoused population in the SCAG region, up from 53,729 in 2012 to 85,000 in 2022 (pg. 14), as a crisis. While there are a number of reasons for homelessness, affordability is a primary cause. We encourage SCAG to be innovative with housing affordability policies. Consider going beyond building affordable housing and also focus on retrofitting the 100,000+ substandard or incomplete facilities identified in the Housing Technical Report (pg. 10), and recommend jurisdictions remove in-lieu fees for affordable housing when issuing entitlements for new developments.</p> <p>FHBP applauds the discussion on page 15 of Regional Advance Mitigation Programs (RAMP); however, the Plan doesn't specifically say it will implement a RAMP. We recommend SCAG use its regional leadership position to assist communities, cities, counties, and/or transportation/infrastructure agencies to implement new RAMP or complement existing programs to accommodate new mitigation needs (i.e. climate impacts and vehicle miles traveled). Further, RAMPs are a strategy identified in the Pathways to 30x30 document released by the California Natural Resources Agency, specifically Pathway #5. We encourage SCAG to call out Connect SoCal's alignment with this statewide plan.</p>	<p>SCAG will continue to encourage increasing housing supply and affordability across the region as part of its housing strategy. This includes promoting preservation of affordable housing and, as part of these efforts, including substandard units.</p>
0001688.08.1	<p>Section 4.3 (Resilience Shocks and Stressors)</p> <p>While sea level rise does cause flooding, it is a distinct issue. Additionally, while aging infrastructure is more prone to damage by sea level rise, the concept of aging infrastructure doesn't capture the entire picture of damage done via sea level rise.</p> <p>In the table on page 18, please include "sea level rise" in the shocks column because "flooding" doesn't adequately capture both concepts. Please include damage to critical infrastructure in the stressors column because "aging infrastructure" doesn't adequately capture both concepts.</p>	<p>Comment noted. Discussion on sea level rise and damage to infrastructure is included in Section 4.3 in the Land Use & Communities Technical Report.</p>

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0001688.09.1	<p>Section 5.1 (Building a Regional Growth Vision)</p> <p>On page 19, the Report states, “The growth visioning process in Connect SoCal 2024 aims to strengthen the relationship between the region’s growth vision and local implementation by instead integrating sustainability considerations before local review, then assessing the collective effect of local edits on the overall development pattern.” How will this be reported, tracked, and analyzed?</p> <p>On the same page, Table 1 shows a sizable decrease in population growth in 2019-2050 from the population growth during 1990-2019. It also shows increases in household growth in three of the six counties in the SCAG region (pg. 20). Please explain the incongruity between the population growth and household growth in Orange, Riverside, San Bernardino, and Ventura Counties.</p>	<p>The Forecasted Regional Development Pattern was able to contribute to achieving plan targets in large part due to this “front-loading” of sustainability goals in plan development. Figure 1 of the Land Use & Communities Technical Report provides a basic comparison between plans and plan versions. Through SCAG’s Regional Data Platform—specifically the annually-updated land use data series which uses local jurisdiction engagement, commercial building permit databases, and county assessor data—we are able to gauge where growth occurs on a regular basis. The California Department of Housing and Community Development has recently released site-level tracking data which is also able to track development location. Implementation strategies such as those in SCAG’s Regional Early Action Plan are awarded in part based on whether growth is in a location that furthers SCS objectives. Finally, implementation tracking is required by the California Air Resources Board.</p> <p>Region-wide population growth is anticipated to be far slower over the next three decades than during the past three decades. County-specific growth projections are conducted using a cohort-component model wherein births and in-migration are added to the population, and deaths and out-migration are subtracted. This is balanced with household and employment projections and model assumptions (see Tables 7 and 8 in the Demographics & Growth Forecast Technical Report) are developed under the advice of a panel of experts.</p> <p>Due to aging, increased housing production, and smaller household sizes, each county’s household growth rate is expected to exceed its population growth rate. While the rate of housing growth is expected to be highest in Riverside and San Bernardino Counties, nearly half of the region’s new housing units are anticipated in Los Angeles County. Differences can be partially attributable to the expectation of smaller units on average in Los Angeles County (e.g. infill and accessory dwelling units) and alleviation of the higher levels of unhoused and overcrowded households there.</p>
0001688.09.2	<p>On page 23, SCAG states that the Regional Growth Vision, “Increases household growth in Priority Development Areas (PDAs), but does not require growth to be entirely in PDAs. PDAs are areas within the SCAG region where future growth can be located in order to help the region reach mobility and environmental goals and support complete communities.” FHBP supports the majority of growth in PDAs as that’s where the infrastructure, amenities, and people exist—thus reducing the greenhouse gas emissions and vehicle miles traveled. On page 24, it is estimated that the PDAs—though only 8.4% of the region’s total land area, will accommodate 67% of the region’s household growth and 55% of its total job growth through 2050. This would mean that additional policy considerations should be offered, including “sticks.” FHBP suggests including “carrots and sticks.” Examples of carrots might be streamlined application processing, permit cost reduction/elimination. Examples of sticks might be fees for developments proposed outside of PDAs. We also strongly encourage a buffer to be extended around all PDAs in the developed (island areas) of unincorporated areas of the SCAG region.</p> <p>Similarly, the following statement is unclear and should contain an outline of strategies, such as particular fees, policies, tools or costs associated with disincentivizing development in GRRAs: “Reduces, but does not preclude household growth in Green Region Resource Areas (GRRAs). GRRAs are areas where climate hazard zones, environmental sensitivities, and administrative areas (such as military bases) where growth would generally not advance SB 375 objectives (see Section 5.3).”</p>	<p>Comment noted.</p>

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0001688.10.1	<p>are areas within the SCAG region where future growth can be located in order to help the region reach mobility and environmental goals and support complete communities." FHBP supports the majority of growth in PDAs as that's where the infrastructure, amenities, and people exist—thus reducing the greenhouse gas emissions and vehicle miles traveled. On page 24, it is estimated that the PDAs—though only 8.4% of the region's total land area, will accommodate 67% of the region's household growth and 55% of its total job growth through 2050. This would mean that additional policy considerations should be offered, including "sticks." FHBP suggests including "carrots and sticks." Examples of carrots might be streamlined application processing, permit cost reduction/elimination. Examples of sticks might be fees for developments proposed outside of PDAs. We also strongly encourage a buffer to be extended around all PDAs in the developed (island areas) of unincorporated areas of the SCAG region.</p>	<p>Comment noted.</p>
0001688.10.2	<p>Similarly, the following statement is unclear and should contain an outline of strategies, such as particular fees, policies, tools or costs associated with disincentivizing development in GRRAs: "Reduces, but does not preclude household growth in Green Region Resource Areas (GRRAs). GRRAs are areas where climate hazard zones, environmental sensitivities, and administrative areas (such as military bases) where growth would generally not advance SB 375 objectives (see Section 5.3)." If, as the document states in Section 5.3 (pg. 44), a goal is to "Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption, and promote resilience," how does losing 48,000+ and 8,100+ acres of natural and farmlands, respectively, by 2050 in any way serve to meet that goal?</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>

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0001688.11	<p>Section 5.2 (PDAs Guiding the Forecasted Regional Development Pattern)</p> <p>On page 24, SCAG states, "PDAs in Connect SoCal 2024 include Neighborhood Mobility Areas (NMAs), Transit Priority Areas (TPAs), Livable Corridors and Spheres of Influence (SOIs) (in unincorporated areas only)" and "PDAs are a technical tool to facilitate plan development and analysis and are used for different purposes in the Plan, such as growth visioning, performance measurement or grant applications." As mentioned before, this language suggests there are "carrots" for developing in PDAs; however, in order to achieve greater success with guiding development in PDAs where development belongs, there must be "sticks" or fees and costs associated with developing outside of PDAs. These policy statements are therefore only indicating compensation for good land use decisions, but failing to deter bad decisions. On page 25, the Report explains, "Livable Corridors" and the objective to "redevelop single-story under-performing retail with well-designed, higher density housing and employment centers." FHBP supports redeveloping low-density city-centered retail strip-mall-type developments to be more efficient, higher density, transit oriented, walkable, and more attractive for the community. Are there additional policy objectives that could be identified that ensure the buildings aren't simply given a face-lift rather than a complete beneficial re-design? One policy objective could be to only provide transit improvements and transit investments if the re-design meets certain criteria and thresholds. Another policy objective could be to remove parking requirements in high quality transit areas. The discussion regarding Spheres of Influence (SOIs) on page 26 misses an opportunity to encourage buffers around 15-Minute Communities in the unincorporated areas in the SCAG region. Please use your political capital to encourage buffers around 15-Minute Communities in the developed (island areas) of unincorporated counties to reduce sprawl, support transit, protect natural and farmlands, improve quality of life, and encourage higher-density growth.</p>	<p>Comment noted. Priority Development Areas (PDAs) are areas within the SCAG region where future growth can be located in order to help the region reach Plan goals. While the descriptions and data inputs of PDAs generally reflect the principles and targets of Connect SoCal, they are non-binding growth visioning tools. Additionally, they were utilized to assist in developing the preliminary growth forecasts, which were then reviewed by local jurisdictions during the Local Data Exchange which took place between May 2022 and December 2022. Feedback was accepted during this time to modify SCAG's records for priority development areas boundaries; however, following their use as a growth visioning tool, the TAZ-level household and employment growth forecast data became the sole reflection of anticipated growth in Connect SoCal.</p> <p>SCAG has no land use or construction authority, therefore we cannot implement fees or costs associated with development occurring outside of PDAs. Through our Sustainable Communities Program and Regional Early Action Planning Program, we prioritize projects that are consistent with the goals of Connect SoCal, specifically those that fall within PDAs. 15-minute communities do not include fixed boundaries and are instead intended to support existing and established communities across the region to deploy a series of strategies that increase access to important destinations and mobility options. The program development around this planning concept will ensure alignment with Connect SoCal and planning activities that support a reduction in VMT.</p>
0001688.12	<p>The document states on page 26, "According to the Regional Forecasted Development Pattern, 72 percent of the region's household growth from 2019-2050 projected to occur in unincorporated areas is estimated to occur in SOIs." How much of the SOI is in a PDA? It is unclear how 72% of the region's household growth can occur in SOIs, when page 24 states 67% of the growth will occur in PDAs. For example, the majority of SOIs in Orange County are in the foothills, mountains, and severely geographically constrained areas. The overlap in PDAs and SOIs must be understood.</p>	<p>Comment noted. Section 5.2 of the Land Use and Communities Technical Report discusses in depth the four Priority Development Areas within Connect SoCal 2024. "According to the Regional Forecasted Development Pattern, 72% of the region's household growth from 2019-2050 projected to occur in unincorporated areas is estimated to occur in SOIs" is explicitly discussing growth in unincorporated areas of the region, and not region wide. So 72% of household growth in unincorporated areas would occur in spheres of influence. "67% of all growth will occur in PDAs" is describing growth as a whole, region-wide. For clarity, we will remove: "According to the Regional Forecasted Development Pattern, 72% of the region's household growth from 2019-2050 projected to occur in unincorporated areas is estimated to occur in SOIs."</p>
0001688.13.1	<p>Section 5.4 (Development Outside of PDAs)</p> <p>We again reiterate our request that SCAG encourage buffers around 15-Minute Communities in the rural areas. Please include the policy recommendation for buffers around 15-Minute Communities in the Report's discussion on page 34.</p>	<p>15-minute communities do not include fixed boundaries and are instead intended to support existing and established communities across the region to deploy a series of strategies that increase access to important destinations and mobility options. The program development around this planning concept will ensure alignment with Connect SoCal and planning activities that support a reduction in VMT.</p>
0001688.13.2	<p>We believe we've found an error in the document. It says on page 36, 148% of jurisdictions participated, but 167 out of 197 were met with one-on-one. How could 148% of jurisdictions have participated? Please explain.</p>	<p>Comment noted. A correction was made to the page, which now reflects the appropriate percentage of cities providing feedback (48%).</p>
0001688.14	<p>Section 6.1 (Equitable Engagement and Decision-Making)</p> <p>The regional planning policies and implementation strategies outlined on page 39 are comprehensive and supported by data in the Plan. We believe the implementation strategies will achieve the goal stated on page 40, "The overall goal of engagement efforts should be to reflect the needs and voices of impacted communities as clearly as possible in the plans, policies, and program developed." FHBP requests benchmarks and timelines for these engagement tools, including development of the Equity Assessment Tool, Community Based Organization Partnering Strategy, pilot programs, and resource guide.</p>	<p>Comment noted. Timelines for the strategies to promote Equitable Engagement and Decision-Making can be shared as SCAG progresses in the development of each resource.</p>

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0001688.15.1	<p>Section 6.2 (Climate Resilience) While FHBP applauds SCAG's nod to promoting sustainable water use planning, practices, and storage on page 41, we cannot find the nexus between that desire and the projected 0.4% water savings over the life of the Plan identified on page 184 in Table 5.2 "Connect SoCal 2024 Co-Benefits." Please explain.</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>The Scenario Planning Model's Water Module calculates indoor and outdoor water use for residential and commercial buildings. Indoor water use is estimated per-capita, while outdoor water use is estimated based on irrigated area. Indoor and outdoor water use was first calculated according to the following baseline rates and then adjusted to account for the application of efficiency and conservation practices into the future. Outdoor water use for residential and commercial buildings was calculated based on assumptions about the amount of irrigated area, and per-acre watering needs based on climate. The amount of outdoor irrigated area per residential unit varies according to assumptions about lot size, hardscape percentage, and irrigated percentage which are grounded in building type studies. Per-acre landscape irrigation requirements were derived from annual reference evapotranspiration (ETo) values from California Irrigation Management Information System.</p> <p>Model results for the 2019 base year at the water district level were calibrated using 2019 monthly water use reports submitted by urban water utilities with more than 3,000 customers. For those submitted by urban water utilities areas served by multiple providers, average values were used. For future scenarios, water use was first calculated according to baseline rates and then adjusted to account for the application of anticipated water efficiency and conservation practices into the future.</p>
0001688.15.2	<p>Again, the benefits of natural resource preservation are overlooked in this section and should be addressed. [See the soon to be submitted Natural and Farmlands Coalition letter for a list of resources on the economic benefits of open space. As stated in that letter, "Parks not only generate jobs, but also economic activity, increase residential property values, reduce pollution, improve local tax revenues, increase well-being (thereby reducing medical costs), provide stormwater benefits by capturing precipitation, and much more. Nationally outdoor recreation generated \$1.1T in economic output, exceeding motor vehicle manufacturing and performing arts."] The issue of insurance policy cost and access should be addressed for the implementation strategy within bullet 4.</p>	<p>Additional text on the value of parks and open space has been added to Section 6.3 Natural and Farmlands Preservation in the Land Use and Communities Technical Report, which identifies the economic and public health benefits of parks and open space. Additionally, the importance of these areas is included in Section 6.4 Complete Communities.</p>

ID	COMMENT	RESPONSE
0001688.16	<p>Section 6.2.1 (Nature-Based Solutions)</p> <p>The Reports states, "Many of the greatest environmental challenges facing the SCAG region, such as increasingly hot temperatures, poor air-quality, and wildfire can be partially or fully addressed by incorporating natural features or processes into the built environment." (pg. 42) Nature-based solutions should also be incorporated into ... nature. Acquisition of natural lands, restoration of landscapes, creation of tidal wetlands, etc., are all nature-based solutions that align with Connect SoCal, but are seemingly ignored due to the anthropocentric approach to the document. We suggest reviewing the California Natural Resources Agency's Natural and Working Lands Climate Smart Strategy for approaches to include, such as forest management, ecological connectivity, adaptive management, combating invasive species, creating climate refugia, etc.</p>	<p>Comment noted. SCAG will incorporate recommendations from the Natural and Working Lands Climate Smart Strategy with regard to fulfillment of Implementation Strategies identified in the Land Use and Communities Technical Report.</p>
0001688.17	<p>Section 6.2.2 (Water Resilience)</p> <p>Continuing our above comment, given the record-breaking droughts the SCAG region is regularly experiencing, FHBP is surprised that the co-benefits of the Connect SoCal Plan for reducing water consumption is only 0.4%. The Report lists sustainable water infrastructure to be incorporated for improving water resilience. These "sustainable water infrastructure" projects should be cost-effective, equitable, economically feasible, and environmentally sound, and should produce more savings than 0.4% over the life of the Plan.</p> <p>The Report lists four nature-based solutions on page 42, and we want to comment on bullet point three. Most drinking water usage in residential zonings is used for landscaping. Therefore it's not just the types of plants planted, but the type of water used to support them. Drinking water should never be used on landscaping as it is a waste of this precious resource. New permits for both residential and commercial projects should require stormwater catchment basins for landscaping purposes and best management practices for low impact development. We recommend that policy objectives be included in this section.</p>	<p>Water conservation for landscaping is addressed in section 6.2.2 Water Resilience in the Land Use and Communities Technical Report, specifically Connect SoCal's regional planning strategy of "Landscaping with native and drought-tolerant plants". Additional text in this section is added to address water consumption for single-family homes related to outdoor uses.</p>
0001688.18	<p>Section 6.2.3 (Urban Greening)</p> <p>While urban trees do, as the document points out, reduce air pollution, capture stormwater, and more, urban greening requires maintenance. The appropriate management of urban trees and vegetation should be acknowledged here.</p>	<p>Text is changed from "Urban greening is especially important in low-income and formerly redlined areas, where urban heat islands are concentrated" to "Urban greening and appropriate maintenance is especially important in low-income and formerly redlined areas, where urban heat islands are concentrated."</p>

ID	COMMENT	RESPONSE
0001688.19	<p>Section 6.3 (Natural and Farmlands Preservation)</p> <p>On page 43, the introductory sentence states, "Preserving the region's natural and farmlands will ensure that future generations will be able to enjoy Southern California's unique landscapes as we do, and benefit from the essential resources that natural lands provide." Again, this anthropocentric view neglects the immense biodiversity found in the California Floristic Province and endemic species found here. These species make Southern California a unique landscape—above and beside the values they bring to the residents. These intrinsic values should be acknowledged.</p> <p>On page 57, the Connect SoCal Plan identifies that 40,000 acres of farmland and 50,000 acres of natural lands were lost in the last decade. The Report says on page 44, "For natural lands, 48,590 acres are anticipated to be converted to urban uses by 2050 from existing conditions. This represents 617 acres more than the Trend/Baseline and is consistent with jurisdictional feedback on locally anticipated growth. With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 18,032 acres of degraded habitat - 1,202 acres more than the Trend/Baseline. Some areas are improved, however, as Connect SoCal will result in 1,891 acres of improved habitat - 666 acres more than the Trend/Baseline. For agricultural areas, specifically, implementation of Connect SoCal will result in conversion of 8,156 acres to urban uses - a loss of an additional 1,464 acres of farmland over the Trend/Baseline. There are economic impacts due to this loss of farmland, where agricultural production value is anticipated to decline by roughly \$9 million through[the] year 2050 compared to the Trend/Baseline. With this loss of both natural and farmlands, groundwater recharge is anticipated to decline by 129,326 acre-feet - 24,862 more acre-feet than the Trend/Baseline scenario."</p> <p>The regional planning policies and implementation strategies listed on page 45 of the Report are apparently not designed to work, based on the massive loss of natural and farmlands identified on the previous page. Please explain how this loss can possibly help to reach environmental, sustainability, and natural lands/farmland goals as outlined throughout the entire Connect SoCal document and this Technical Report?</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>

ID	COMMENT	RESPONSE
0001688.20	<p>Because of the massive loss of natural and farmlands projected, in addition to other sustainability goals not met such as water conservation, stronger mitigation measures are needed to offset the impacts. At this point, the impacts are significant and unavoidable in the Program Environmental Impact Report/Statement.</p> <p>Page 45 of the Report goes on to say, "Connect SoCal envisions Regional Advance Mitigation as a key pathway for natural and agricultural lands preservation, which is included as a Regional Strategic Investment that can support conservation as a means of mitigating the environmental impacts of transportation investments." SCAG is positioned as a leader and regional convener across many jurisdictions and agencies. This position shouldn't be ignored. As asked in our letter on the Plan and in this letter on page 2, does this mean the RAMP will be implemented—especially in light of the fact that the Plan identifies \$1 billion available for RAMP investments? If no RAMP is actually created, how will this investment figure be reached? What is the timeline for implementation of a RAMP?</p> <p>Page 45 also states, "In addition, SCAG's future work will involve conducting a study to examine the economic and fiscal benefits of natural and agricultural lands preservation to support local jurisdictions' decision making by identifying the tradeoffs of conversion of natural and agricultural lands to urban uses, including loss of groundwater recharge areas and climate pollution sequestration." Is this a mitigation measure? If not, why not? How is this included in Connect SoCal?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-6 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001688.21	<p>Section 6.4.1 (Elements of Complete Communities)</p> <p>Page 47 lists Affordable Housing Authorities (AHA) as a tool that can be used to reach infrastructure and housing goals. Local Land Trusts are another option. See the Newport Beach Housing Trust recently established to create affordable housing by linking public and private dollars.</p>	<p>Comment noted.</p>
0001688.22	<p>Section 6.4.3 (15-Minute Communities Policies)</p> <p>Urban growth boundaries, density transfers, transfer taxes (see Martis Fund), and transfers of development rights should be added to the list of options to support the realization of complete communities. (See pg. 46)</p> <p>As the Report clearly defines on page 48, "A 15-Minute Community is one in which people can access most or all their daily necessities, services, and amenities within a 15 minute walk, bike, or roll (e.g., using a mobility device) or as places that result in fewer and shorter trips because of the proximity of complementary land uses. Because key destinations are located closer together, the length or number of trips that people make is reduced." In order to ensure these objectives are met, SCAG must list as an attribute that each 15-Minute Community has a buffer to encourage higher density development. Please add buffers in the bulleted list of positive attributes on page 48. Please also include buffers as regional planning policy number four for 15-Minute Communities on page 49. Preventing sprawl can be an effective policy tool to assist in meeting higher density land use objectives in developed (island areas) of unincorporated communities.</p>	<p>15-minute communities do not include fixed boundaries and are instead intended to support existing and established communities across the region to deploy a series of strategies that increase access to important destinations and mobility options. The program development around this planning concept will ensure alignment with Connect SoCal and planning activities that support a reduction in VMT.</p>

ID	COMMENT	RESPONSE
0001688.23.1	<p>Section 7.4 Summary of Plan Impacts and Benefits</p> <p>On page 56, land consumption of greenfield land for the baseline is 78 square miles and is listed as 41 square miles under the Connect SoCal Plan. This doesn't resonate with the data provided on page 44 of the Report. Please explain.</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>
0001688.23.2	<p>Page 56 compares the baseline and Connect SoCal Plan's cumulative fiscal impacts to infrastructure capital. Does the figure of \$23.8 billion under Connect SoCal include sea level rise infrastructure impacts?</p>	<p>Comment noted. No, the figure does not include general sea level rise infrastructure impacts. To better anticipate a wide range of potential futures and strengthen the resilience and preparedness of the region looking forward, SCAG is developing a Regional Resilience Framework that includes a collaborative exploratory scenario planning element that will augment the traditional Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) planning process. This process will not be focused on achieving predetermined outcomes or targets. Rather, it will explore pressing issues and potential near- and long-term disruptions to Southern California, such as the current and projected impacts of sea level rise. This exploration will be expansive and help identify pathways for developing future regional and local plans, including those addressing resilience, emergency preparedness and health equity, and findings will be factored into SCAG's ongoing work as well as Connect SoCal 2028.</p>
0001688.23.3	<p>The chart on page 57 compares the baseline and the Plan's household costs. Only transportation and utility costs are included. Given that home insurance rates have skyrocketed in California in the last five years and now represent a larger piece of the household expenditures' pie, a home insurance line item should be included.</p>	<p>SCAG utilizes a Scenario Planning Model to determine projected impacts of Connect SoCal. At this time, the measurement of insurance costs vary significantly depending on various factors, including climate hazards, and cannot be calculated within the model.</p>

ID	COMMENT	RESPONSE
0001688.23.4	Respiratory related illness rates are not the sole indicator of community health, as the Public Health line item in the chart on page 57 seems to indicate. The Public Health line item should include numerous other health indicators such as life-longevity, obesity rates, etc. These data are easily obtained via sources such as CalEnviroScreen.	SCAG utilizes a Scenario Planning Model to determine projected impacts of Connect SoCal. At this time, the Scenario Planning Model is not able to project health impacts, other than respiratory illnesses.
0001688.23.5	FHBP will be submitting comments by document. Sometimes there is overlap with the Program Environmental Impact Report and Environmental Impact Statement, so both email addresses are included when submitting. This letter serves as the second of several on the Plan, its appendices, and environmental documents. Thank you for the opportunity to comment on the Land Use and Communities Technical Report. [REDACTED]	Comment noted.
Submitted by	Friends of Harbors, Beaches and Parks	Submittal 0001689
0001689.01	Section 1. Executive Summary The homelessness crisis should be mentioned in the Executive Summary.	The fourth paragraph in Section 1. Executive Summary is changed to read, "A shortfall of housing to meet the needs of the SCAG region have created issues such as cost-burden and overcrowded households. The shortfall production of housing combined with these issues has led to an increase in homelessness throughout the SCAG region and the State overall.
0001689.02	Section 3. Regulatory Framework The baseline for the Plan is 2019. The final Regional Housing Needs Assessment (RHNA) plan was adopted by SCAG in 2021 (pg. 5). How does the baseline inform the RHNA plan? Is the RHNA plan informed by post-pandemic trends such as out-migration?	Comment noted. The 6th cycle RHNA plan did not take into consideration regional post-pandemic trends as the RHNA methodology was adopted on March 5, 2020 prior to the impacts of the pandemic. Once the 7th RHNA cycle begins, post-pandemic trends and their effects on population and housing will be taken into consideration. SCAG continues to assess how the pandemic has affected the region through demographics and forecast. As SCAG develops the 7th cycle, we will have more information on those effects.
0001689.03	Section 4.2 Housing Tenure On page 7, the Report discusses the disparity among homeownership rates for communities of color. FHBP appreciates that one of the implementation strategies is identifying innovative homeownership models specifically directed at underrepresented groups of homeowners.	Comment noted.
0001689.04	Section 4.3 Complete Facilities According to data on page 10, there are over 100,000 substandard, typically renter-occupied units in the SCAG region. These units are disproportionately occupied by Blacks and Native Americans, and many are located in rural areas. Fixing these substandard housing units would go a long way toward addressing a social equity issue. On page 10, the Report says, "production of more housing in these communities, especially in rural and non-infill areas, can address historical disparities." While more housing can address historical disparities, fixing the over 100,000 units of substandard housing would also address historical disparities since most of these units are occupied by Blacks and Native Americans. Furthermore, completing these facilities increases these renters' health and safety, addresses permitting violations, and doesn't require major infrastructure projects. We encourage SCAG to consider pilot programs, grant programs, and toolkits for addressing these conditions.	Comment noted. The retrofitting and improvement of substandard housing can be a part of local efforts to preserve affordable housing. While SCAG does not have control over housing units, it will continue to support local policies that support the preservation of affordable housing.
0001689.05	Section 4.6 Displacement Pressures On page 19, the Report states, "Displacement pressures can be further exacerbated by major public investments, such as improved infrastructure and amenities." The response is simply to build more housing in these communities. It seems there's a missed opportunity to be more creative. Are there any policy initiatives that could protect existing vulnerable communities when major infrastructure projects are proposed? Further, could infrastructure be fixed in place, similar to the "Fix it First" freeway concept in Connect SoCal, to minimize housing displacement?	Comment noted. SCAG included an implementation strategy focused on community stabilization efforts, including preservation.

ID	COMMENT	RESPONSE
0001689.06	<p>Section 4.7 Homelessness</p> <p>Please include policies and grant proposals to fix the 100,000+ identified units of substandard housing in the SCAG region. While these units don't directly address the unhoused crisis, they can surely help improve housing equity and stability for at least 100,000 residents. This would also align with the "Step Toward Fairness" section in Connect SoCal (pg. 28) where it relays three ways disparities have occurred: health, wealth, and opportunities. As noted in those comments we asked that "access" be included because it is an institutional and systemic barrier—just like it is here.</p>	<p>Comment noted. The retrofitting and improvement of substandard housing can be a part of local efforts to preserve affordable housing. While SCAG does not have control over housing units, it will continue to support local policies that support the preservation of affordable housing. In addition, the draft Plan includes implementation strategies that are focused on preservation efforts.</p>
0001689.07	<p>Section 5.1 Permits Issued</p> <p>This helpful discussion regarding types of permits issued for residential type development makes it clear that single-family housing is still the dominant type of permit issued in the SCAG region, even though the numbers are shifting toward multi-family housing. Are there innovative policy methods to encourage more multi-family developments absent density bonuses and streamlining, like adaptive reuse policies or converting outdated/underperforming stripmalls into mixed use developments?</p> <p>Page 23 outlines the following data: "the SCAG region issued a total of 236,124 residential permits, which represents 79.1 percent of the total RHNA allocation of 412,127. While one could conclude that the SCAG region collectively met a substantial portion of its total housing need, a significant percentage of affordable housing need was largely unmet as illustrated in Figure 19." We strongly recommend the elimination of in-lieu fees for affordable housing as a policy initiative to further the goal of meeting the demand for affordable housing. Can SCAG use its political capital to lobby to eliminate in-lieu fees, or, at a minimum, add this as a policy discussion in the Technical Report?</p>	<p>Comment noted. SCAG supports a variety efforts that support affordable housing production. SCAG has focused efforts to increase housing production through its REAP 2 program and more specifically supporting jurisdictions to establish policy that is supportive of housing production, innovative financing, and addressing inadequate infrastructure needs.</p>
0001689.08.1.1	<p>Section 6: Regional Best Practices</p> <p>Senate Bill 2: It is great news that SCAG jurisdictions were awarded \$42.4 million through this bill to update planning documents and streamline housing production. When will we know the outcomes from this effort?</p> <p>Assembly Bill 101 is from 2019. Do we know the outcomes from that funding to address homelessness and housing?</p> <p>Infill Infrastructure Grant (IIG): FHBP supported the IIG grant when SCAG requested a sign on. Since 2016, the SCAG region received over \$191 million for infrastructure and housing. This money can also be used to rehabilitate parks and open space. Do we have any information to report on the outcomes from the funding?</p> <p>It is our understanding that Regional Early Action Planning (REAP) documents were due to the Housing and Community Development Department in November 2023. Metrics under REAP 1 were more generic (like the number of cities represented or number of participants). There was no methodology used for an actual analysis. We hope that SCAG collects metrics under REAP 2 and is able to report that to the public.</p>	<p>Comment noted. Outcomes of recent housing funding legislation will occur as programs conclude. For SB 2 and IIG, the California Department of Housing and Community Development (HCD) has been collecting measurable outcomes and SCAG will monitor information as it becomes available.</p> <p>The metrics collected from REAP 1 programs depend on the individual program. Different programs will have different metrics, such as, but not limited to, expected housing units to be produced, pro-housing ordinances adopted, or number of cities represented as in the case of the Housing Policy Leadership Academy. REAP 1 and its funding bill AB 101 will conclude at the end of December 2024, and SCAG will share information with the CEHD Committee and Regional Council after it submits its final report on the program to HCD in Fall 2024.</p>
0001689.08.1.2	<p>We appreciate the work SCAG is doing, outlined on pages 34-36. The work is quite positive, and based on the increased permits issued for multi-family housing, SCAG's initiatives are working. However, there is still substantial development on Green Region Resource Areas (GRRAs). As Connect SoCal 2024 states on page 57, 40,000 acres of farmland and 50,000 acres of natural land were paved over in the last decade. We recommend SCAG consider discouraging development on natural and farmlands in a more punitive way.</p>	<p>Comment noted. Connect SoCal includes Regional Planning Policies and Implementation Strategies that will support land use authorities (i.e. local jurisdictions) to preserve existing natural and agricultural lands. These are further described in the Land Use & Communities Technical Report in Sections 5.3 and 6.3, which include implementation strategies to "Continue efforts to support partners to identify priority conservation areas—including habitat, wildlife corridors, and natural and agricultural lands—for permanent protection" and "Identify and leverage resources for research, policies and programs to conserve and restore natural and agricultural lands".</p>

ID	COMMENT	RESPONSE
0001689.08.2	<p>As noted in our first letter, on page 10, the Connect SoCal Executive Summary outlines that, “urbanization continues to consume farmlands and open spaces, which contributes to the loss of groundwater supply and habitat areas that play a critical role in strengthening the region’s resilience. SCAG will collaborate with federal, state, and local partners to ensure that the implementation of the Plan helps address existing air quality challenges, preserve natural lands, and reduce GHG emissions.” (emphasis added with underline). With such a bold statement in Connect SoCal it is surprising to see that a plan that spans the next 26 years only anticipates 1,891 acres of habitat to be improved across six counties. (See Land Use Technical Report, pg. 44) Why is this number so low, especially when the Plan notes a goal is to be more resource efficient? (See Connect SoCal, pg. 11)</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation’s Farmland Mapping and Monitoring Program, as well as corrections to the Module’s inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG’s locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 “Natural and Agricultural Lands Preservation” Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>
0001689.09	<p>Furthermore, if the population is trending toward decline (See Connect SoCal pg. 31), why aren’t the natural lands preservation numbers higher?</p>	<p>The Connect SoCal growth projection process was undertaken with an understanding that the region was currently in a period of population decrease. The 2019-2023 population decline is not expected to continue in the long run due to the expectation of job growth, partial restoration of immigration levels, reduction in excess deaths due to COVID-19, and a major reversal in the domestic out-migration trend—all of which have been observed by mid-2023. Future projections can be found in the Demographics & Growth Forecast Technical Report.</p> <p>As described in the Land Use and Communities Technical Report and found in detail in Table 3, natural lands preservation measures are a function of comparing the Connect SoCal 2024 plan versus a trend/baseline assuming no policy intervention. In order to provide a meaningful comparison but also to limit the number of exogenous forces considered (focusing instead on topics for which regional policy may have more valence), both these scenarios rely on the same level of growth at the regional and county levels. Section 2.3 and Figure 2 of the Demographics & Growth Forecast Technical Report do provide a discussion of some possible impacts of higher or lower total regional growth. However, since the total amount of growth is kept constant in this analysis, there is a relatively narrower band of strategies that affect it—put simply, we only look at different locations for the same amount of growth. As such this and related measures (e.g.</p>

single-family versus multifamily housing, or share of growth in Priority Development Areas) are inherently more limited in their magnitude.

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Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).

ID	COMMENT	RESPONSE
0001689.10	<p>Section 7: Best Practices for Jurisdictions and Stakeholders</p> <p>FHBP appreciates the discussion on page 37 that highlights why all development can't be focused in Priority Development Areas (PDA). Regarding rural and agricultural areas, is the 15-Minute Community the only means SCAG is using to address development there? We would recommend buffers around 15-Minute Communities to protect against sprawl into the GRRRA—especially county unincorporated GRRRA. And again, retrofitting incomplete housing in those areas would be very beneficial to the housing stock.</p> <p>It is our understanding as part of REAP 2, Regional Utility Supporting Housing (RUSH) requires programs in infill areas or PDAs and must adjoin rights of way. RUSH aligns with PDA-focused housing, infrastructure, and limits growth in GRRRA. Our comments again support PDA-focused housing and tools such as adaptive reuse, and stripmall conversions as tools to be used as best practices for jurisdictions.</p> <p>Thank you for including the discussion on page 39 regarding urban greening in 15-Minute Communities. We noticed the absence of this topic in the Land Use Technical Report. We encourage SCAG to include in both the Housing and Land Use and Communities Technical Reports policies and recommendations for parks and urban greening efforts in 15-Minute Communities. Parks, especially, help to meet the Plan's goals of healthy and sustainable communities. Furthermore, as a SCAG Community Partner, FHBP heard from residents that neighborhood park accessibility is lacking, especially for people without vehicles. (See FHBP's Land Use and Community Technical Report comment letter for details.)</p> <p>Studies show that the general public doesn't know what the term "open space" actually is—in fact, the public thinks it is "air." We encourage SCAG to be cognizant of this interpretation and that people better understand the word "park" (even if it is a wilderness area, community garden, regional park, or land trust ownership). Best practices for upgrading access to parks can come in the form of reprogramming streets to improve accessibility. (See FHBP's Connect SoCal comment letter for details on this subject.)</p>	<p>15-minute communities do not include fixed boundaries and are instead intended to support existing and established communities across the region to deploy a series of strategies that increase access to important destinations and mobility options. The program development around this planning concept will ensure alignment with Connect SoCal and planning activities that support a reduction in VMT. Urban greening is addressed in Section 6 of the Land Use and Communities Technical Report.</p>
0001689.11	<p>Section 7.4 Housing Supportive Infrastructure and Utilities</p> <p>Another potential strategy to add to the list on page 42, related to development impact fees, would be to increase, then funnel, impact fees for developments on GRRRA, or projects outside PDAs and 15-Minute Communities, to support infill projects' utilities infrastructure. This would achieve two goals: further discourage projects outside of preferred areas and support infill higher density projects.</p>	<p>Comment noted. SCAG continues to explore strategies to support housing development in Priority Development Areas.</p>
0001689.12	<p>Section 7.6 Anti-Displacement Strategies And Increasing Affordable Housing In High Resource Areas</p> <p>One tool that could be used to reduce displacement is extending affordability covenants. This could be achieved in a number of ways, including something similar to a right of first refusal for the local jurisdiction or a local housing trust to "buy" additional time to extend the affordability term.</p>	<p>Comment noted. SCAG included an implementation strategy focused on community stabilization efforts, including preservation.</p>

ID	COMMENT	RESPONSE
0001689.13	<p>Section 8.2 Implementation Strategies</p> <p>We are unclear as to why there are no strategies aimed at specifically producing more multi-family housing. Employing adaptive reuse strategies or creating mixed use developments at underperforming stripmalls are two opportunities for SCAG to include.</p> <p>When SCAG says on page 45, "provide technical assistance for jurisdictions to complete and implement their housing elements," will SCAG provide guidance on the contents of the Housing Elements? How will policies and strategies from Connect SoCal be encouraged? This is a great opportunity for SCAG to use its political capital to gain better policies locally and regionally that support additional housing, ensuring local control, and aligning Housing Elements with Connect SoCal.</p> <p>It continues to be unclear to us how SCAG can support local jurisdictions in an effort to retrofit substandard housing to realize 100,000 complete facilities. Improving these facilities improves lives and moves the needle toward a more equitable and just region. SCAG did an excellent job of providing the data and identifying the issue, but failed to identify a solution. How will SCAG help improve the 100,000 substandard facilities?</p> <p>FHBP continues to support development in PDAs as it meets the goals of the 2024 Connect SoCal Plan, the goals of AB 32 and SB 375, and simultaneously meets the "environment" pillar of the 2024 plan by limiting development in the GRRRA.</p> <p>FHBP will be submitting comments by document. Sometimes there is overlap with the Program Environmental Impact Report and Environmental Impact Statement, so both email addresses are included when submitting. This letter serves as the third of several on the Plan, its appendices, and environmental documents. Thank you for the opportunity to comment on the Housing Technical Report.</p>	<p>The implementation tools discussed in the Housing Technical report are intended to help jurisdictions increase housing supply, affordability, and choice and align with the strategies outlined in Connect SoCal. At the local level, targeting priority development areas (PDAs) and similar strategic areas can produce more multi-family housing. Additionally, tools developed by SCAG, such as the Other-to-Residential Toolkit, provide guidance to jurisdictions to facilitate residential development on underperforming strip-malls and other types of underutilized sites.</p> <p>As part of its REAP 1 and upcoming REAP 2 work, SCAG has aligned its programs to strongly promote goals found in Connect SoCal, particularly increase housing supply, reducing vehicle miles traveled, and affirmatively furthering fair housing. SCAG will continue to align its program funding with Connect SoCal goals to provide technical assistance to jurisdictions to complete and implement their housing elements.</p> <p>The retrofitting and improvement of substandard housing can be a part of local efforts to preserve affordable housing. While SCAG does not have control over housing units, it will continue to support local policies that support the preservation of affordable housing.</p>
Submitted by	Friends of Harbors, Beaches and Parks	Submittal 0001753
0001753.01	<p>We are pleased to see SCAG advancing the preservation of the environment by including it as one of the four core goals. As stated in the plan, "The goals for Connect SoCal are designed to help us achieve our vision. They fall into four core categories: mobility, communities, environment, and economy. These goals are not mutually exclusive—they are mutually reinforcing." (pg. 12)</p> <p>Recognizing the interconnectedness of these core categories is a step in the right direction.</p>	Comment noted.
0001753.02	<p>We've reviewed the RTP/SCS and offer the following comments and clarifying questions for consideration in the Plan with the intent to make clearer and strengthen the Plan's language. Further, we hope to link the goals of the RTP to SCAG's aim of reducing greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) per AB 32 and SB 375. These goals also align well with the recently codified SB 337—protecting 30% of the state's lands and waters by 2030—by encouraging housing placement in appropriate urban locations, while simultaneously conserving habitat lands, riparian areas, and creating climate resilient landscapes.</p> <p>SCAG has a tremendous opportunity with the 2024 Plan. The State has provided ambitious reduction targets for both GHG emissions and VMT for passenger and light duty vehicles. Conservation of our natural lands can have a significant role in both. Converting land from its natural state to more urban uses increases GHG emissions—while leaving land as is, allows the vegetation and soil to continue to sequester carbon. Further, most greenfield developments are at the urban fringe in Green Region Resource Areas (GRRRA)—far from services, transit, and amenities, thus increasing both GHG emissions and VMT.</p> <p>Preservation of GRRRA sites will eliminate the need for any VMT for projects that could have been built. In other words, conservation of natural and farmlands can reduce both GHG and VMT to help SCAG achieve its mandate.</p>	Comment noted.

ID	COMMENT	RESPONSE
0001753.03	<p>In 2023, Governor Newsom signed SB 337 (Min-D) into law requiring the state to protect 30% of California's lands and coastal waters by 2030 (30x30). The California Natural Resources Agency has identified in its Pathways to 30x30 [https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/30-by-30/Final_Pathwaysto30x30_042022_508.pdf] document, 10 strategies to achieve this. These include concepts like executing strategic land acquisitions to institutionalizing advance mitigation. There are also three priorities: protect and restore biodiversity, expand access to nature, and mitigate and build resilience to climate impacts.</p> <p>SCAG has an unprecedented opportunity to align Connect SoCal and its strategies and policies with the existing 30x30 effort. We collectively urge SCAG to capitalize on this opportunity.</p>	<p>Comment noted. Discussion on 30x30 is included in Section 2.5.3 in the Land Use and Communities Technical Report, and several of the Regional Planning Policies and Implementation Strategies related to natural lands preservation are included in the Report.</p>
0001753.04	<p>Much of the last four years has been spent by the Coalition engaging on the SoCal Greenprint and in SCAG's Natural and Farmlands Working Group.</p> <p>The Coalition continues to believe SCAG has the leadership in place, the right staff at the helm, the homework done, the support by the conservation community, and the interest and attention of the permitting agencies to now transition to implementing conservation activities.</p> <p>This is your opportunity to walk the walk, instead of simply talking the talk. We stand ready to help conserve and restore land throughout Southern California for the benefit of its millions of residents.</p>	<p>Comment noted.</p>
0001753.05	<p>First and foremost, we applaud your efforts at community engagement in the development of the 2024 Plan. SCAG partnered with 16 community based organizations, FHBP included, that hosted 20 pop-up events and collected over 3,600 survey responses. This engagement was integral to developing a plan that reflects the needs and desires of the region. We hope this outreach and engagement continues with plan implementation.</p> <p>That said, we were disappointed with the comment submission limitations on the SCAG website, which allows one comment at a time (up to 25) to be submitted by one individual entity. This approach, while it makes sense to organize comments at SCAG's end, hinders public participation from the community side—especially Coalitions. While we outreached to staff to solve this problem and submit th letter electronically, not everyone else likely had this wherewithal.</p>	<p>Comment noted. SCAG will consider changes to the comment submission form in the future to allow for a higher number of comments. For the draft Connect SoCal 2024 public review and comment period, the submission form did allow for users to submit attachments, which enabled some commenters to submit longer letters without the restriction of the 25 comment limitation.</p>

ID	COMMENT	RESPONSE
0001753.06	<p>The Coalition has two general questions:</p> <p>1. The Connect SoCal Executive Summary states on page 10, "SCAG will collaborate with federal, state, and local partners to ensure that the implementation of the Plan helps address existing air-quality challenges, preserve natural lands, and reduce GHG emissions."</p> <p>How will SCAG ensure these three important objectives are achieved during the Plan's implementation? There are performance measures, but not consequences if goals aren't met.</p>	<p>Comment noted. The performance monitoring of regional transportation system investments has always been an important means for evaluating progress being made toward meeting our regional goals and the efficiency of the various projects and policies that have been implemented to help achieve them. The Performance Monitoring Technical Report describe how the program of investments, programs, and strategies included in Connect SoCal 2024 are expected to benefit the SCAG region. The objective of the Connect SoCal 2024 performance measures is to provide a quantitative mechanism to effectively link the regional goals identified in the Plan with actual performance at the implementation level, ensuring production of a performance-based plan relative to its development, implementation, and outcome. Performance monitoring is key to understanding which projects, programs, and strategies are proving successful in meeting specific regional goals and which ones may require modification or reconsideration. Ultimately, progress toward achieving SCAG's regional objectives is primarily made through implementation of the RTP/SCS at the local level. The implementation of a carefully calibrated monitoring program, able to provide a quantitative assessment of how our programs and strategies are performing toward achievement of the regional goals identified in Connect SoCal 2024, will serve to support future regional and local planning efforts and transportation system investment options.</p> <p>However, it is important to note that there are consequences to the region for failing to meet federal and state requirements, specifically the Clean Air Act requirements to demonstrate transportation conformity are necessary for securing federal funding and project approvals and a determination from the California Air Resources Board that SCAG can achieve the greenhouse gas emission reduction target is required to access to Senate Bill 1 funded programs.</p>
0001753.07	<p>The Coalition has two general questions:</p> <p>We understand the baseline population is updated every five years. However the past five years, in particular, changed the working and living landscape for the foreseeable future and these changes aren't included in the 2019 baseline. How were the Plan's policies adjusted given the stated decline in the region's population from 2019-2023 and the recent trend of working from home post-COVID? We believe a stronger explanation of this noticed trend is warranted within the document—even if it is called out as a footnote.</p>	<p>The Connect SoCal growth projection process was undertaken with an understanding that the region was currently in a period of population decrease. The 2019-2023 population decline is not expected to continue in the long run due to the expectation of job growth, partial restoration of immigration levels, reduction in excess deaths due to COVID-19, and a major reversal in the domestic out-migration trend—all of which have been observed by mid-2023.</p> <p>Staff were able to use a 2019 base year (starting point) which had been updated with Census 2020 data—at the time of the projection the P.L.94-171 Redistricting File provided block-level populations which we used to develop a much more accurate – and lower – starting point from which to conduct projections. The California Department of Finance's demographic projections for the region and state have also been reduced downward following the release of this data.</p> <p>An additional reference to the Demographics & Growth Forecast Technical Report has been included in the "COVID-19 Pandemic Recovery" section to direct the reader to more detail and stronger explanation. Sections where this is discussed specifically include 3.1, 3.1.1, and 3.3.2.</p>

ID	COMMENT	RESPONSE
0001753.08	<p>CONNECT SOCAL EXECUTIVE SUMMARY</p> <p>The Plan states, on page 10, "The impacts of climate change also exacerbate underlying health risks in vulnerable and historically marginalized communities. In addition, urbanization continues to consume farmlands and open spaces, which contributes to the loss of groundwater supply and habitat areas that play a critical role in strengthening the region's resilience. SCAG will collaborate with federal, state, and local partners to ensure that the implementation of the Plan helps address existing air-quality challenges, preserve natural lands, and reduce GHG emissions."</p> <p>How exactly will SCAG effectively collaborate with all its jurisdictions, county transportation commissions, and the environmental community to ensure the Plan's environmental goals are met?</p>	<p>Comment noted. SCAG collaborates with jurisdictions, county transportation commissions, the environmental community and other stakeholders in a variety of ways. See Chapter 2 "Taking Action" section for examples of SCAG's roles in implementation and accomplishments to date. Chapter 3, Section 3.4 "Plan Fulfillment" includes a list of Implementation Strategies for Connect SoCal 2024.</p>
0001753.09	<p>CHAPTER 2: OUR REGION TODAY 2.2 NEW AND EVOLVING TRENDS Resilience</p> <p>According to the Plan, "Resilience is defined as the capacity of the SCAG region's built, social, economic, and natural systems to anticipate and effectively respond to changing conditions, acute shocks and chronic stressors by creating multiple opportunities for a sustainable, thriving, and equitable future." (pg. 36) The Coalition believes SCAG does a good job of considering the resilience in economic systems, natural systems, and social systems, but falls short of examining resilience to the built environment.</p> <p>Given the stressor of sea level rise, we recommend that SCAG closely examine the vulnerabilities at the coast and provide policies to implement to ensure our built systems such as transportation and utilities can withstand the challenges posed by sea level rise.</p> <p>We recommend reviewing the following information for policies and ideas that SCAG should incorporate into the Plan: Author: Ocean Protection Council; Resource: Ocean Protection Council Sea Level Rise Policy Guidance [https://www.coastal.ca.gov/climate/slrguidance.html] Author: California Coastal Commission; Resource: Critical Infrastructure [https://documents.coastal.ca.gov/assets/slr/guidance/SLR%20Guidance_Critical%20Infrastructure_11.3.2021_FINAL_FullPDF.pdf]</p> <p>Further, we believe thoughtful, strategic planning can accommodate both shocks and stressors. SCAG is in the unique position to help jurisdictions do just that and provide funding for the assessments, planning, and mitigation.</p>	<p>Comment noted. The discussion of resilience in Connect SoCal 2024 has been informed by the work the agency has done on resilience and climate change issues, largely driven by the Regional Council's Resolution on Climate Change Action, adopted in January 2021. This work remains ongoing, and SCAG continues to work towards finding innovative solutions to the risks and challenges presented by climate change in order to advance well-informed policies that strengthen the resilience of our region and its communities. As part of the implementation of Connect SoCal 2024, SCAG will continue engaging with local jurisdictions to advance thoughtful, strategic climate action and resilience planning, providing assistance and support as a regional coordinating body.</p>
0001753.10	<p>CHAPTER 2: OUR REGION TODAY SECTION 2.3 REGIONAL CHALLENGES</p> <p>We applaud SCAG for its excellent effort to engage as many community members, community-based organizations, and stakeholders' input to inform the development of the Plan. The effort made the Plan better and validated its policies. Our regional challenges to building more housing are summarized well in the statement, "Not only does it include construction costs, such as the cost of land, materials and labor, but local land use entitlement processes and environmental requirements can also add cost to the process." (pg. 49)</p> <p>Another core challenge that requires examination is land availability to construct the region's needed housing through 2050.</p>	<p>The fourth paragraph of subsection Communities in Section 2.3 Regional Challenges is changed to read, "Not only does it include construction costs, such as the cost and limited availability of land, materials and labor, but local land use entitlement in processes and environmental requirements can also add to the cost of the process."</p>

ID	COMMENT	RESPONSE
0001753.11	<p>CHAPTER 3: THE PLAN</p> <p>On page 78, the Vision and Goals are outlined in terms of Leadership, Implementation, and Evaluation.</p> <p>Evaluation is a measurement of implementation, and we would like further information regarding the benchmarks used for the evaluation and monitoring.</p>	<p>Comment noted. Connect SoCal uses two types of performance measures to assess progress of the Plan toward achieving the defined regional goals. The Plan performance assessment measures are used to evaluate performance of Connect SoCal relative to the 2019 Base Year and the 2050 'no-build' scenarios. The on-going metrics are used to assess progress being made toward the Plan goals over time, using observed data. The benchmark used to measure progress for both assessments is observed performance in the SCAG region in the base year of 2019.</p>
0001753.12.1	<p>CHAPTER 3: THE PLAN SECTION 3.2: THE HEART OF THE PLAN A Vision for 2050 According to the Plan on page 85, "Environment:</p> <ul style="list-style-type: none"> ● Create a healthy region for the people of today and tomorrow ● Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change ● Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water ● Conserve the region's resources" <p>Given the vision outlined for the environment, and given the reduction in predicted population growth coupled with the increased environmental stressors, what policies in particular will accommodate these facts? There are performance measures, but not consequences if goals and subgoals aren't met.</p>	<p>Comment noted. Long-run regional population growth is expected to be substantially lower than in past periods—we are now planning for growth of roughly 2.06 million persons over the next thirty years compared to growth of roughly 4.19 million over the past thirty years. The future outlook is also substantially lower than Connect SoCal 2020's thirty-year projection horizon which anticipated growth of roughly 3.6 million people by 2045. One major implication is the expected reduction in the region's average household size from 2.99 in 2019 to 2.63 in 2050. This is due to an aging population and strong expected housing growth. However, it also means that more residents are likely to drive alone rather than with others and on its own can increase per-capita travel demand. The forecast's theme of "Slower Growth, Steady Improvement" is intended to capture the comparatively modest population growth envisioned here in the context of regional planning by emphasizing the continued need for housing, supportive infrastructure, and the opportunity it presents for improved environmental protection. No one policy, or strategy, is intended on its own to achieve Plan objectives.</p>
0001753.12.2	<p>How will SCAG ensure these goals and subgoals are achieved during the Plan's implementation?</p>	<p>Comment noted. The on-going performance monitoring program used to support the implementation of Connect SoCal 2024 emphasizes environmental preservation through several new performance measures. These metrics include the number and value of regional habitat connectivity investments, nature-based mitigation programs, and the share of Williamson Act contract acres that have been impacted by urban development. The purpose for these and the other Connect SoCal performance measures is to ensure that the SCAG region stays on track toward achievement of the Plan goals and sub-goals. SCAG is evaluating opportunities to improve our ability to effectively monitor and report regional progress toward achievement of Connect SoCal regional goals through development of new tools and data resources.</p>

ID	COMMENT	RESPONSE
0001753.13	<p>CHAPTER 3: THE PLAN SECTION 3.2: THE HEART OF THE PLAN Priority Development Areas (PDAs) We acknowledge the regional challenge associated with needing new affordable housing to accommodate our growing population, and the simultaneous challenge with making sure those new units are built near transit areas, is city-centered, is walkable/bikeable, and does not build on greenfield sites or high risk areas (like those prone to wildfires or sea level rise). Additionally, during the public engagement process, thousands of people across the region reflected on the challenges facing Southern California, and the community's top concerns are: housing affordability, limited reliable travel options other than driving, and climate change impacts.</p> <p>PDAs account for 8.4 percent of the region's total land area, and according to the Plan, implementation of SCAG's recommended growth strategies will help these areas accommodate 67% of forecasted household growth and 55% of forecasted employment growth between 2019 and 2050.</p> <p>What are SCAG's strategies for ensuring this is accomplished?</p>	<p>Comment noted. Priority Development Areas (PDAs) are areas within the SCAG region where future growth can be located in order to help the region reach Plan goals. While the descriptions and data inputs of PDAs generally reflect the principles and targets of Connect SoCal, they are non-binding growth visioning tools. Additionally, they were utilized to assist in developing the preliminary growth forecasts, which were then reviewed by local jurisdictions during the Local Data Exchange which took place between May 2022 and December 2022. Feedback was accepted during this time to modify SCAG's records for priority development areas boundaries; however, following their use as a growth visioning tool, the TAZ-level household and employment growth forecast data became the sole reflection of anticipated growth in Connect SoCal.</p> <p>SCAG has strategies that support SCAG's growth strategies. Including two PDA strategies that call for support local jurisdictions and implementing agencies' strategies to promote plans and projects within PDAs by providing awards, grants and technical assistance. In addition, under Housing the Region, the Plan includes implementation strategies that call for identifying and pursue partnerships at the local, regional, state, and federal levels to align utility, transit and infrastructure investments with housing development and equitable outcomes across the region. A notable example of where we have supported this is in our REAP 2 program where SCAG awarded funding to a series of housing and transportation projects across the region in infill areas.</p> <p>Furthermore, in many instances, affordable housing projects will go after state and federal funding, such as the Strategic Growth Council's Affordable Housing and Sustainable Communities program. Letters of support from the MPO are part of the application process. SCAG evaluates the location of the project to determine if it is consistent with the Sustainable Communities Program. PDAs are utilized to determine whether or not a project is eligible for the grant or not. Over the past 6 rounds of AHSC funding, SCAG has supported more than 84 projects throughout the region and helped secure more than half a billion dollars in affordable housing funding.</p>
0001753.14	<p>CHAPTER 3: THE PLAN SECTION 3.2: THE HEART OF THE PLAN Green Region / Resource Areas (GRRAs) On page 103, we support SCAG's effort to de-emphasize development in areas that fall under multiple convergences of GRRAs given the higher level of environmental impacts that would require additional mitigation measures</p>	<p>Comment noted.</p>
0001753.15	<p>CHAPTER 3: THE PLAN SECTION 3.2: THE HEART OF THE PLAN Natural and Agricultural Lands Preservation On page 107 of the Plan, in addition to the environmental and community benefits, these lands hold enormous economic values related to agricultural product sales, agricultural employment, enhanced viewshed and therefore increased property values, recreational spending, to name some.</p> <p>SCAG should also acknowledge the economic benefits of natural and agricultural lands.</p>	<p>Comment noted. Text is changed from "Preserving natural and agricultural lands can strengthen our communities, improve essential resources like our air, water and food, protect and enhance biodiversity, and capture greenhouse gases instead of allowing them to concentrate in the atmosphere" to "Preserving natural and agricultural lands can strengthen our communities, improve essential resources like our air, water and food, protect and enhance biodiversity, provide economic benefits and capture greenhouse gases instead of allowing them to concentrate in the atmosphere."</p>
0001753.16.1	<p>CHAPTER 3: THE PLAN SECTION 3.2: THE HEART OF THE PLAN The Future of Prosperity Tourism The Coalition appreciates SCAG's attention to tourism and recreation in the region. From the local and regional parks and coastal resources to the state and federal ones—Southern California has many opportunities to enjoy and recreate in the protected lands and waters regardless if you live/work in the region or are here as a tourist.</p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001753.16.2	<p>What's missing from this section is an accounting of how access to parks and the coast substantially contribute to the economy.</p> <p>Parks not only generate jobs, but also economic activity, increase residential property values, reduce pollution, improve local tax revenues, increase well-being (thereby reducing medical costs), provide stormwater benefits by capturing precipitation, and much more. Nationally outdoor recreation generated \$1.1T in economic output, exceeding motor vehicle manufacturing and performing arts.</p> <p>Author: National Recreation and Parks Association; Resource: The Economic Impact of Local Parks [https://www.nrpa.org/contentassets/f568e0ca499743a08148e3593c860fc5/2022-economicimpactreport.pdf];</p> <p>Author: The Trust for Public Land; Resource: The Economic Benefits of the Public Park and Recreation System in the City of Los Angeles, California [https://www.tpl.org/wp-content/uploads/2017/05/CA_LA-Economic-Benefits-Report_LowRes.pdf]</p> <p>Author: Headwaters Economics; Resource: The Outdoor Recreation Economy by State [https://headwaterseconomics.org/economic-development/trends-performance/outdoor-recreation-economy-by-state/]</p> <p>Author: Institute for Local Government; Resource: The Economic Benefits of Open Space, Recreation Facilities and Walkable Community Design [https://www.ca-ilg.org/sites/main/files/file-attachments/resources__synthesis_shoup-ewing_march2010.pdf?1441322910]</p>	<p>Comment noted. Narrative text will be edited to provide updated data/information.</p>
0001753.17	<p>CHAPTER 3: THE PLAN SECTION 3.3: REGIONAL PLANNING POLICIES Environment On page 118, policy 53 states supporting investments to reduce hazardous air pollutants and GHG emissions.</p> <p>Are there specific investments SCAG can prioritize and encourage?</p>	<p>Yes, page 118 of the draft Connect SoCal 2024 referred to the Regional Planning Policies that can promote multimodal transportation investments and local development that align with the regional growth vision. For specific investments prioritized in the Plan, please see the Regional Strategic Investments discussed in Chapter 3, in particular: Transit and Multimodal Integration: Regional Enhancements and Improvements and Complete Streets: Planning for All Users.</p>
0001753.18	<p>CHAPTER 3: THE PLAN SECTION 3.3: REGIONAL PLANNING POLICIES Environment On page 119, policy 59 correctly identifies that the economic benefits of natural and agricultural lands must be prioritized. SCAG recognizes economic benefits of these natural and working lands.</p> <p>We encourage SCAG to also acknowledge the existence of harder to quantify economic benefits in terms of viewsheds and their relationships to increased property values and well-being.</p>	<p>Comment noted. SCAG recently received a Sustainable Agricultural Lands Conservation grant, through which these types of considerations may be explored.</p>
0001753.19	<p>CHAPTER 3: THE PLAN SECTION 3.3: REGIONAL PLANNING POLICIES Environment Policy 62 on page 119 encourages the protection and restoration of wildlife corridors.</p> <p>What implementation or mitigation measures will encourage the development and protection of wildlife corridors?</p>	<p>SMM-BIO-1 in the draft PEIR for Connect SoCal 2024 identifies that "SCAG shall support research, programs, and policies that identify, protect, and restore natural habitat corridors and continue support for preserving wildlife corridors and wildlife crossings through information sharing, such as showcasing best practices and regional collaboration forums like SCAG's Natural and Farm Lands Conservation Working Group". Further, an Implementation Strategy in Section 5.3 of the Land Use and Communities Technical Report identifies that SCAG will "continue efforts to support partners to identify priority conservation areas—including habitat, wildlife corridors, and natural and agricultural lands—for permanent protection".</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-8 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001753.20	<p>CHAPTER 3: THE PLAN SECTION 3.3: REGIONAL PLANNING POLICIES Environment Policies 67, 68, and 69 on page 119 provide an incredible opportunity to promote individual residential and commercial water storage activities. There are many places throughout the Plan where rainwater storage capture could be required prior to the issuance of a building permit. This is an opportunity for SCAG to take a localized approach to water management. For example, King City, CA requires all new development to capture all stormwater onsite and recharge the aquifer onsite—going above and beyond related state regulations. This is another way for SCAG to plan for the forecasted shocks and stressors as outlined in Section 2.2.</p> <p>Has SCAG explored recommending such permitting restrictions?</p>	<p>Comment noted. Section 6.2 in the Land Use and Communities Technical Report includes an Implementation Strategy that cites the opportunity of alternative groundwater recharge approaches: "Collaborate with partners to foster adoption of alternative groundwater recharge technologies, storm water capture systems, urban cooling infrastructure and greywater usage systems that can reduce water demand and/or increase water supply."</p>
0001753.21	<p>CHAPTER 3: THE PLAN Section 3.4 Plan Fulfillment Natural and Agricultural Lands Preservation On page 132, SCAG is leading the identification and leveraging resources for, "research, policies and programs to conserve and restore natural and agricultural lands."</p> <p>Has SCAG developed criteria for identification?</p>	<p>Comment noted. SCAG regularly engages with state and federal agencies to identify grant resource opportunities, and shares information through our regular engagements of the Natural and Farmlands Conservation Working Group. Through this forum and other engagements with universities, SCAG has provided support and collaboration for research efforts related to natural and agricultural land preservation and restoration.</p>
0001753.22	<p>CHAPTER 3: THE PLAN Section 3.4 Plan Fulfillment Natural and Agricultural Lands Preservation Also on page 132, SCAG is the lead to, "Explore opportunities to increase and quantify the carbon sequestration potential and resilience benefits of natural and agricultural lands—and pursue funding for implementation and demonstration projects."</p> <p>We request that SCAG ensure the added economic benefits of agriculture land viewsheds and open space / recreation are not only considered, but also included.</p> <p>Further, chaparral habitat is found in all SCAG counties. Information related to sequestration potential for this habitat type would benefit the entire SCAG geography.</p> <p>We request SCAG provide details on how it intends to quantify sequestration potential. And, how will implementation and demonstration projects be selected?</p>	<p>Comment noted. SCAG was recently awarded a Sustainable Agricultural Lands Conservation grant from the Strategic Growth Council that will examine the economic and non-economic benefits of natural and agricultural lands, including the groundwater recharge implications of new development in these areas and the benefits of carbon sequestration. SCAG will leverage this study to explore opportunities to develop resources and best practices and identify potential opportunities that could be shared through working groups.</p>
0001753.23	<p>Section 4.2 Economic Outlook Overview SCAG's financial model should also include the availability of raw land.</p>	<p>Comment noted. The Connect SoCal 2024 financial plan only includes surface transportation funding and expenditures, consistent with state and federal requirements.</p>
0001753.24	<p>Section 4.2 Economic Outlook Retail Sales Growth SCAG should include in this section retail sales growth from open space / recreation activities. Also, open space / recreation activities are generally not impacted by economic slowdowns and recessions; rather usage increases—as seen during COVID.</p>	<p>Comment noted.</p>
Submitted by	Friends of Harbors, Beaches and Parks	Submittal 0001755

ID	COMMENT	RESPONSE
0001755.01	<p>Section 5.1 Performance Outcomes Performance Monitoring Plan Performance</p> <p>On page 176, the Environment plan performance is identified as, "Will people and our environment become healthier?" The Plan outlines specific metrics for environmental health (i.e., air quality, wildlife corridors, increased quantity of flora and fauna). It isn't clear from the Plan what "healthier" looks like for SCAG residents. Please define this.</p>	<p>Comment noted. Connect SoCal 2024 considers health outcomes in the SCAG region relative to both environmental sustainability (air quality, wildlife and floral habitat preservation, conservation of open spaces), and public health (asthma incidence, respiratory pathology, physical activity-related pathology). In addition, SCAG actively monitors and reports safety conditions on our regional transportation network. Connect SoCal 2024 envisions a healthier SCAG region as having better air quality due to reduced congestion, shorter commute distances, and reduced dependency on single occupancy vehicles; improved respiratory health outcomes due to cleaner air; reduced rates of obesity and other physical activity related conditions due to more opportunities for residents to engage in regular physical exercise including improved access to parks, open space, and walking and bicycle facilities. We also envision reduced levels of stress experienced by commuters in the SCAG region due to improved traffic congestion conditions and having more quality time available to spend with family and for community engagement. A healthier region will also provide for a significantly safer travel experience as a result of multimodal transportation system safety enhancements and an improved ability to monitor, and proactively respond to, traffic safety risks throughout the region.</p>
0001755.02	<p>Section 5.1 Performance Outcomes Performance Monitoring Plan Performance</p> <p>Table 5.1 outlines Performance Measures, baseline conditions, conditions with Connect SoCal, and the trend. On page 181, the table lists: "Park Accessibility" with two performance measures:</p> <ol style="list-style-type: none"> 1. "Share of population able to reach a park within 30 minutes by auto 2. Share of population able to reach a park within 30 minutes by transit" 	<p>Comment noted. Section 6.3.2 of the Equity Analysis further explores accessibility to parks through walking (0.5 miles, 0.75 miles, 1 mile) and biking (1 mile, 3 miles, 5 miles). This is the first time Connect SoCal has assessed walking and biking as part of the park accessibility analysis. Further research is currently being conducted to advance Connect SoCal's analysis on park accessibility using biking and walking measures.</p>
	<p>This car-centric focus goes against the concept of a 15-minute city, urges people to continue to use GHG intensive methods to get to parks, and is outdated in its approach. SCAG should focus on a 15-minute walk or ride to a park. The Trust for Public Land has a tool that calculates a community's "ParkScore," [https://www.tpl.org/parkscore] which provides on-the-ground information about park equity for communities and the greater SCAG region. These performance measures should be redrafted to focus on pedestrian-oriented access to parks.</p>	

ID	COMMENT	RESPONSE
0001755.03	<p>Section 5.1 Performance Outcomes Performance Monitoring Plan Performance</p> <p>Also on page 181, the table indicates that the baseline land conversion to urban purposes is 78 square miles and under Connect SoCal it is 40. The Comparative Benefit Analysis (p. 184) indicates a savings of 37 square miles (should it be 38 square miles saved?), which would equate to 24,320 acres. If Connect SoCal actually achieves land preservation as is identified in the Comparative Benefit Analysis, then why does the Land Use Appendix (pg. 44) only identify 1,891 acres as “improved” or ~2.8 square miles?</p> <p>Further, there are inconsistencies between the Connect SoCal baseline numbers and natural lands conversion with those found in the Land Use Appendix. Connect SoCal and the Land Use Appendix that should match acreages/square miles</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation’s Farmland Mapping and Monitoring Program, as well as corrections to the Module’s inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG’s locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 “Natural and Agricultural Lands Preservation” Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>
0001755.04	<p>The Coalition believes that the SB 337 should be added to the Glossary in that it directly ties to SCAG’s Plan and performance measures.</p>	<p>The glossary is updated to include Senate Bill 337.</p>
0001755.05	<p>Section 2.4 California State Wildlife Action Plan (SWAP) The most recent update of the SWAP is from 2015 and is therefore almost nine years old. Can the information be supplemented with new data and information available by the California Department of Fish and Wildlife and/or United States Fish and Wildlife Service?</p>	<p>Comment noted. The Land Use and Communities Technical Report cites the SWAP as a minimum requirement for integration into Connect SoCal. SCAG engaged with jurisdictions in 2022 to review the initial growth forecast and provided maps with several different wildlife and habitat data layers, both individually and grouped by the themes, to help inform that feedback. These are referred to collectively as Green Region Resource Areas (GRRAs) in the Land Use & Communities Technical Report. Data layers include the California Department of Fish and Wildlife’s California Natural Diversity Database for rare, threatened and endangered species and plants, and the following datasets to define sensitive habitat areas: US Fish and Wildlife Services National Wetlands Inventory Data; California Department of Fish and Wildlife Areas of Conservation Emphasis; and the California Department of Fish and Wildlife Habitat Connectivity Project. Some data layers may differ from those utilized for analysis in the PEIR as the GRRAs were representative of data available in 2022.</p>

ID	COMMENT	RESPONSE
0001755.06	<p>Section 2.5 SCAG SCS Land Use Priorities</p> <p>Given the importance and adoption by SCAG's Regional Council of the SCAG Climate Resolution, we request again that SCAG add mitigation measures for disruptions to services from infrastructure damage due to sea level rise.</p> <p>As outlined in Section 2.5.2, SCAG's Water Resolution, "In October 2022, SCAG's Regional Council adopted its Water Action Resolution (Resolution No. 22-647-3)." The Resolution calls on SCAG to, "identify, recommend and integrate into Connect SoCal 2024 policies and strategies to align investments in water infrastructure with housing needs and the adopted growth forecast and development pattern." Connect SoCal 2024's water resilience regional planning policies and implementation strategies that fulfill Regional Council's direction are included in Section 6.2.2."</p> <p>We encourage SCAG to think outside the box and truly be innovative in recommending water resilience and conservation policies, including strengthening stormwater aquifer recharge policies, and residential rainwater catchment for landscaping. As we're all aware, 70% of water usage by a single family home is landscaping which provides a huge opportunity to achieve greater drinking water resiliency by eliminating the use of drinking water for landscaping purposes.</p>	<p>Comment noted. Connect SoCal 2024 includes policies centered around resilience and resource conservation, which are discussed in greater detail within the Land Use and Communities Technical Report. SCAG is also in the process of initiating a study to better understand water issues in the region, determine SCAG's role in regional water management, and find new policies and strategies that SCAG can advance to improve water security in Southern California.</p>
0001755.07	<p>Section 2.5.3 Pathways to 30x30 Strategy</p> <p>As mentioned above, we are encouraged by SCAG's connection of the Connect SoCal Plan with Governor Newsom's signed Executive Order N-82-20 that aims to combat the climate and biodiversity crises by conserving 30% of California's land and coastal waters by 2030.</p> <p>Since SB 337 now codifies 30x30, it should be incorporated into the Plan. SCAG's work can easily align with SB 337 and meet local, regional, state and federal conservation goals. Further, there are co-benefits to protecting landscapes including securing cultural, paleontological, and archaeological sites for permanent preservation.</p>	<p>Comment noted. SB 337 (Min) is included in the Land Use and Technical Report within Section 2.5.3.</p>
0001755.08	<p>Section 3.2 Natural and Farmlands</p> <p>We appreciate the mention that Southern California, as part of the California Floristic Province, is one of the 25 top biodiversity hotspots on the planet. Unfortunately, we lost 50,000 natural lands acres and 40,000 acres of farmland between 2012 and 2019 to development. This is unacceptable because it's unsustainable, and it doesn't align with the State's 30x30 Goals. One way to combat the loss of such valuable lands is to place the proper value of these lands. Natural and farmlands are not vacant lands, but resources that have value above and beyond what's listed by SCAG on page 11.</p> <p>Please ensure other values such as viewshed values, ecosystem services, and recreational spending are included.</p>	<p>Comment noted. SCAG recently received a Sustainable Agriculture Lands Conservation grant where these considerations may be explored.</p>

ID	COMMENT	RESPONSE
0001755.09	<p>Section 4.3 Resilience Shocks and Stressors</p> <p>In the chart on page 18, infrastructure failure is listed under a shock and aging infrastructure is listed as a stressor. Please provide additional mitigation measures and policy objectives related to infrastructure damage or loss due to sea level rise.</p>	<p>Connect SoCal includes Regional Planning Policies and Implementation Strategies that support addressing impacts from climate change such as sea level rise.</p> <p>System Preservation and Resilience Policy: Promote transportation investments that advance progress toward the achievement of asset management targets, including the condition of the National Highway System pavement and bridges and transit assets (rolling stock, equipment, facilities and infrastructure)</p> <p>Transit and Multimodal Integration Policy: Create a resilient transit and rail system by preparing for emergencies and the impacts of extreme weather conditions</p> <p>Complete Streets Strategy: Support community-led Complete Streets plans and projects, including those that take into account how to mitigate or adapt to climate change impacts (e.g., extreme heat)</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-8 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001755.10	<p>Section 5.3 Green Region Resource Areas Guiding the Forecasted Regional Development Pattern Rare, Threatened and Endangered Species and Plants & Sensitive Habitat Areas</p> <p>On page 31 of the Technical Report, there is listed multiple data resources for inventories, status, and locations of rare plants and animals in the SCAG Region and beyond.</p> <p>We encourage SCAG to supplement the old, 2015 data in the SWAP with more relevant data from these sources when considering any policies and mitigation measures.</p>	Comment noted.

ID	COMMENT	RESPONSE
0001755.11	<p>Section 5.5 Growth Forecast and Local Data Exchange (LDX)</p> <p>On page 36, it states, "as part of the Local Data Exchange (LDX) process, SCAG conducted a survey to better understand the trends, existing conditions and local planning in the region....Of the 197 jurisdictions in the SCAG region, 46 percent completed the LDX Survey and provided integral feedback to frame local planning. Key findings include: Environmental - The most common natural lands conservation strategies used by local jurisdictions are development impact fees (47 jurisdictions), tree planting or other urban heat mitigation (40 jurisdictions), and hillside/steep slope protection (37 jurisdictions)."</p> <p>Please describe what SCAG learned from local jurisdictions regarding how the development impact fees are used to mitigate the environmental harms the fees were generated for.</p>	<p>Comment noted. There were two questions from the Local Data Exchange Survey which included references to Development Impact Fees. The first one asked:</p> <p>Does your jurisdiction use any of the following natural lands conservation strategies: conservation easement, development impact fee, Hillside/steep slope protection, mitigation bank, multiple species habitat conservation program, natural community conservation plan, transfer of development rights, and tree planting or other urban heat mitigation. The results to this question are:</p> <p>Conservation easement: 28 of 76 respondents indicated "yes" Development impact fee: 47 of 76 respondents indicated "yes" Hillside/steep slope protection ordinance: 37 of 77 respondents indicated "yes" Mitigation bank: 7 of 75 respondents indicated "yes" Multiple species habitat conservation program: 12 of 73 respondents indicated "yes" Natural community conservation plan: 10 of 71 respondents indicated "yes" Transfer of development rights: 12 of 75 respondents indicated "yes" Tree planting or other urban heat mitigation: 40 of 74 respondents indicated "yes"</p> <p>The second question which referenced development impact fees is as follows: Does your jurisdiction have a development/impact/linkage fee ordinance?</p> <p>Development fee ordinance: 53 of 82 respondents indicated "yes" Impact fee ordinance: 54 of 82 respondents indicated "yes" Linkage fee ordinance: 11 of 77 respondents indicated "yes"</p> <p>And lastly, "if yes to the previous question, which of the following does any of the fees fund?"</p> <p>Active Transportation: 23 of 55 respondents indicated "yes" Affordable Housing: 14 of 57 respondents indicated "yes" Local Streets and Roads: 46 of 60 respondents indicated "yes" Natural Lands/Open Space Preservation: 20 of 55 respondents indicated "yes" Parks: 53 of 63 respondents indicated "yes" Traffic and/or Vehicle Miles Traveled (VMT) reduction: 19 of 55 respondents indicated "yes" Transit Improvements/Amenities: 23 of 52 respondents indicated "yes"</p>
0001755.12	<p>Section 6.3 Natural and Farmlands Preservation</p> <p>As mentioned above, the complete values of natural and farmlands should be considered when discussing its preservation. We also encourage the evaluation of local jurisdictions' success in using development impact fees collected to actually mitigate environmental harms. We express our strong support for the implementation strategy listed on page 45, "Work with implementation agencies to support, establish, or supplement Regional Advance Mitigation Programs (RAMP) for regionally significant transportation projects that help mitigate environmental impacts and reduce per-capita Vehicle Miles Traveled (VMT), and provide enhanced data on mitigation opportunities through the Intergovernmental Review Process."</p> <p>We believe regional mitigation projects and programs are more successful than individual local jurisdictional efforts to mitigate project impacts.</p>	<p>Comment noted. SCAG was recently awarded a Sustainable Agricultural Land Conservation grant from the California Department of Conservation to identify the economic and non-economic value of agricultural and natural lands, which will help local jurisdictions weigh the trade-offs of development and the potential negative impacts on natural resources (i.e. groundwater recharge).</p>

ID	COMMENT	RESPONSE
0001755.13	<p>Section 7.4 Summary of Plan Impacts and Benefits</p> <p>In the chart on page 55, comparing household mix (single family, townhome, multi-family) between the baseline (no Connect SoCal Plan) and the 2050 End State, or Connect SoCal Plan, the numbers could be better. While there shows a decrease in single family homes as an overall percentage, the increase in townhomes and multi-family homes are minimal.</p> <p>Based on all the studies and data, we know that single family homes were over-built in the 1980-2000s. We anticipate the Connect SoCal policies and strategies would increase the number of multi-family permitting much greater than is outlined. If in fact, PDAs will be the focus of growth, the number of single family residential units would be lower than townhome and multi-family units, but it is not. Why?</p>	<p>Comment noted. The end state reflects the percentage of total housing units by 2050, including what is already built. Comparing "2019-50 Net Growth" Trend/Baseline and "2019-50 Net Growth of Connect SoCal provides a very different outlook of what household growth will look like.</p> <p>Under the Trend Baseline Net Growth 2019-50, 57% of new housing would be single family (931,000 units) 43% of new housing would be Multifamily + Townhomes. (689,000 units)</p> <p>Under Connect SoCal Net Growth 2019-50, 29% of new housing would be single family (465,000 units) 71% of new housing would be Multifamily + Townhomes (1,155,00 units).</p> <p>Furthermore, while multifamily housing is a key piece of PDA growth, 15-minute communities, and related plan policies and implementation strategies, we recognize--in part through the input of our local jurisdiction partners during the forecast development process--that exogenous market conditions are likely to yield additional single-family homes in the region too. As described on page 47, the single/multi-family split of new housing changes over time and is driven in large part by the anticipated age structure and household size. Since 2000 the single-family share has been 56 percent and since 2010 it has been 44 percent, suggesting that Connect SoCal 2024 represents a fairly substantial improvement over past periods.</p>
0001755.14.1	<p>Section 7.4 Summary of Plan Impacts and Benefits</p> <p>On page 57, the Coalition has numerous comments on the data presented:</p> <ul style="list-style-type: none"> ● Why are home insurance costs not represented in the household costs section? The cost of home insurance has skyrocketed in the last five years, so much so that the majority of traditional homeowner insurance carriers have pulled out of the state (All State and State Farm), have excessive premiums for existing policy holders, and/or are creating staggering burdens on lower and middle income families. Only including transportation and utility costs does not present a complete picture of contemporary household costs in the SCAG region. 	<p>Comment noted. The household transportation and energy costs associated with Section 7.4 of the Land Use and Communities Technical Report are based on SCAG's Scenario Planning Model (SPM) described in Section 7.2. The SPM provides directional and order-of-magnitude regional impacts of local land use and policy decisions and contrasts the Plan against a trend/baseline scenario. While insurance premiums and availability have recently begun to present major concerns vis-à-vis housing affordability, the SPM is not able to analyze every component of housing cost. This is an area of study state-wide, however, and SCAG will monitor trends in insurance costs as they relate to growth in areas with climate hazards.</p>
0001755.14.2	<ul style="list-style-type: none"> ● Why is the only public health data point related to respiratory health costs? There are myriad health related data points that should be included such as obesity rates, longevity rates over time, birth rates, and exposure to toxins, pesticides, particulate matter, and contaminated groundwater. Please review and include data from CalEnviroScreen. 	<p>Comment noted. The Connect SoCal 2024 plan assessment performance measures includes metrics for public health incidence and costs associated with air pollution, which includes respiratory health issues; and also for public health incidence and costs associated with the lack physical activity, which includes a wide range of conditions such as obesity and diabetes. SCAG is actively seeking opportunities to improve the tracking and reporting of health and safety outcomes in the region.</p>

ID	COMMENT	RESPONSE
0001755.14.3	<ul style="list-style-type: none"> ● In the Land Conservation section of the chart, we have the following concerns: <ol style="list-style-type: none"> 1. Why is the active farmland and natural land converted HIGHER with Connect SoCal versus the baseline? 2. Why is the habitat degraded only 1,202 acres less under the SoCal Plan versus the baseline? 3. Why are the agricultural areas converted to urban lands 1,464 acres higher under the SoCal Connect Plan versus the baseline? Isn't the Plan supposed to improve the rate of conversion? 	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>

ID	COMMENT	RESPONSE
0001755.15	<p>PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT (PEIR) / PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT (PEIS)</p> <p>The PEIR/PEIS includes two types of mitigation measures: SCAG Mitigation Measures (SMM) and Project-Level Mitigation Measures (PMM). Implementation Strategies</p> <p>The Implementation Strategies (pg. 2-26 through 2-28) fail to adequately align with the proposed goals of Connect SoCal and the Project List. For example, to align with the goals and subgoals in the Plan, the implementation strategies should include:</p> <ul style="list-style-type: none"> ● A GHG / VMT Regional Advance Mitigation Program (RAMP). ● Actively funding conservation and restoration of natural and agricultural lands by willing seller landowners (instead of continued "research" activities.) ● Funding implementation of climate resilience projects (i.e, stormwater and rainwater capture, wetland restoration, wildland-urban interface restoration, managed retreat, freeway/roadway hardening, urban greening, community gardens, etc.) ● Support partner agency and non-profit applications to preserve and restore natural and farmland conservation and restoration. ● Develop toolkits of policies that combat climate impacts, including using nature-based solutions. <p>Aesthetics</p> <p>SCAG should include the SoCal Greenprint in SMM-GEN-1 (pg. 3.1-23), which we proposed to be modified to read: "SCAG shall continue to facilitate interagency cooperation, information sharing, and regional program development, such as through existing planning tools to support local jurisdictions including various applications offered through the SCAG Regional Data Platform (RDP), SoCal Atlas, HELPR, SoCal Greenprint, and other GIS resources and data services. For more information, please contact SCAG's Local Information Services Team (LIST) at list[at]scag.ca.gov."</p> <p>Agricultural Resources</p> <p>The Coalition supports the SCAG Mitigation Measure (SMM) Agriculture (AG), specifically SMM-AG-2 and -3. We hope that the recent progress on the SoCal Greenprint allows it to be launched in 2024 with the support of both environmental and building interests.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-8 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001755.16	<p>PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT (PEIR) / PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT (PEIS)</p> <p>Air Quality</p> <p>A GHG/VMT RAMP could further offset environmental impacts from Connect SoCal. SCAG has identified VMT mitigation measures in the Project List (see pg. 430) of \$500M, but fails to include a mitigation measure in the PEIR/PEIS to this effect. To actually reduce GHG and VMT, SCAG should add a SMM that creates a GHG/VMT-centric RAMP. This mitigation measure would offset impacts from transportation projects not yet covered by a RAMP. For example, the Orange County Transportation Authority's Environmental Mitigation Program focuses on 13 freeway projects, but ignores the consequences of GHG and VMT from freeways, streets/roads, and transit for the remainder of the Authority's transportation sales tax measure.</p> <p>Biological Resources</p> <p>Under the Biological Resources section (BIO), SMM-BIO-1, it states (page. 3.4-35), "SCAG shall support research, programs, and policies that identify, protect, and restore natural habitat corridors and continue support for preserving wildlife corridors and wildlife crossings through information sharing, such as showcasing best practices and regional collaboration forums like SCAG's Natural and Farm Lands Conservation Working Group." To help meet the Plan's goals to reduce land conversion, SCAG should actively support preservation of natural lands by agencies and land trusts/conservation groups, instead of simply focusing on the research, programs, and policies behind the preservation. This will result in quantifiable acreages protected and restored.</p> <p>Due to the anticipated conversion of approximately 40 square miles of habitat into urban uses (See Connect SoCal, pg. 181), the Coalition recommends that the PEIR include a SMM that creates fine-scale vegetation mapping of natural lands for the SCAG region to be incorporated into the SoCal Greenprint. This will help public agencies and developers use mapping of plant taxa and vegetation types to improve project planning—especially as it relates to regional advance mitigation.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-8 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001755.17	<p>The Project List includes on page 429, \$1B for RAMP with an anticipated completion date of 2050. The purpose of RAMP is early permitting and project streamlining in advance of the project(s) actually being completed. If 2050 is the anticipated completion date of the RAMP, then none of the mitigation will have been done in advance. The mitigation needs to be front loaded with early investment opportunities. If SCAG is serious about offsetting impacts through RAMP, the mitigation program(s) should be set up in advance—in the next five to seven years of this ~25 year plan.</p>	<p>Comment noted. SCAG's Regional Council recently adopted the Regional Advance Mitigation Program (RAMP) Policy Framework, which SCAG will implement to "Work with implementation agencies to support, establish, or supplement voluntary Regional Advance Mitigation Programs (RAMP) for regionally significant transportation projects that help mitigate environmental impacts and reduce per-capita Vehicle Miles Traveled (VMT), and provide enhanced data on mitigation opportunities through the Intergovernmental Review Process." SCAG will work to develop and implement this strategy during the Connect SoCal 2024 implementation period. This development will enable a more refined timeline for implementation of the project as defined on page 429, as well as an understanding of the potential benefits and their timing.</p>
Submitted by	HDR	Submittal 0001671
0001671.01	<p>Metro and the City of Pico Rivera are completing a feasibility study for potential transit enhancements (including a potential BRT) on the Lakewood Blvd-Rosemead Blvd corridor from Long Beach to Pasadena. The project is entitled "Rosemead/Lakewood Boulevard Complete Corridor Plan (BRT + ATP + TOD)"</p> <p>Pico Rivera has currently been awarded a State Sustainable Transportation Planning Grant for this project. This will take the project to the 10% conceptual planning level. The city is concurrently working on a RAISE grant application for this project. Applications will need to be submitted in February. The NOFO refers to US code that states: "any project carried out under this section in an urbanized area shall be subject to the metropolitan planning requirements of section 134". This section basically says that the project needs to be in a long-term transportation plan. We request that this project be included in the 2024 RTP so we can meet that grant application requirement.</p>	<p>The proposed feasibility study is deemed to have a minimal effect on outcomes from Connect SoCal 2024 or the PEIR analyses. The project will have no impact on transportation modeling, including the modeling regarding criteria pollutants and GHG emissions, and only a very minor, insignificant effect on fiscal constraint. The Rosemead/Lakewood Boulevard Complete Corridor Plan has been included in the financially constrained final Connect SoCal 2024, whereas the proposed implementation of the project has been included in the unconstrained project list.</p>

ID	COMMENT	RESPONSE
Submitted by	Highland Fairview	Submittal 0001821
0001821.01	<p>Re: Aquabel/a Specific Plan Amendment Project; Notice of Preparation; City of Moreno Valley, County of Riverside</p> <p>To SCAG:</p> <p>On behalf of the Project applicant, T/Cal Realty II (managed by Highland Fairview) we enclose the completed Notice of Preparation (NOP) of the Draft Subsequent EIR (DSEIR) for the Aquabella Specific Plan Amendment project in the City of Moreno Valley, County of Riverside. The NOP, dated October 25, 2023 was previously sent to SCAG through the State Clearinghouse, but we wanted to be sure SCAG received the NOP and incorporated it into its four-year update to the draft Connect SoCal 2024 RTP/SCS. The City of Moreno Valley is currently processing the DSEIR. The City expects to consider the final SEIR and project approvals in the summer/fall 2024.</p> <p>Please see the enclosure. The project proposes an increase in residential density through a City General Plan Amendment, and we would like the Project and updated residential density to be reflected in the final Connect SoCal 2024 plan expected to be issued by SCAG in April 2024 or thereafter.</p> <p>[excerpts from attached NOP] PROJECT TITLE: Aquabella Specific Plan Amendment</p> <p>LOCATION: The Project site is comprised of approximately 770.5 acres of land located in the southeastern portion of the City of Moreno Valley, California, bordered by Cactus Avenue, Brodiaea Avenue, Iris Avenue, Laselle Street, and Oliver Street. (See Figure 1, Regional Location Map.)</p> <p>PROJECT DESCRIPTION: Project entitlements will include a General Plan Amendment, Specific Plan Amendment, Tentative Tract Map, and Development Agreement. The Project would continue to implement a mixed-use residential community on the Project site with commercial uses, a lake complex and lake promenade, and other amenities, while modifying residential uses to better help the City meet local and regional housing goals. The Aquabella Specific Plan Amendment would provide a comprehensive update to land use and other plans, site development standards, design guidelines, and implementation measures necessary to implement the new vision for the Aquabella mixed-use planned community.</p> <p>The proposed Project would amend SP 218 to guide the development of the remaining undeveloped portions of the Specific Plan area with multi-family and workforce housing options, while providing a town center for recreation, shopping, and entertainment. The proposed Project also includes the potential development of a school site on a parcel designated Residential 5 (R5) on the Project site's eastern boundary.</p> <p>The 770.5-acre Project would include phased development of 15,000 residential units and workforce housing options for all ages and income levels; a 49,900 square foot (sf) mixed-use commercial and retail town center; 80 acres of parks (comprised of a 40-acre lake, a 15-acre lake promenade, and an additional 25 acres of parks); and 40 acres of schools, with up to three elementary school sites and one middle school site. Updated public services and facilities; infrastructure improvements; and other amenities would also be included. (See Figure 5, Proposed Project Land Use Plan.)</p> <p>[See attached letter for the full NOP]</p>	<p>The updated specific plan has been added to SCAG's specific plan database for future plan development. The deadline for local jurisdictions to provide input to land use data and the preliminary growth forecast was in December 2022 at the conclusion of the Local Data Exchange (LDX) process. The City of Moreno Valley provided input on land use and the Transportation Analysis Zone (TAZ)-level growth forecast through the LDX editor on January 9, 2023. All edits were considered timely and integrated directly into Connect SoCal.</p> <p>While land use data (including specific plans) are used as an input to develop Connect SoCal's growth projections, this data is only one input into the Plan's Forecasted Regional Development Pattern, which represents a snapshot in time based on data available during LDX and does not reflect subsequently available information. It is not solely based on TAZ-level household and employment projections; rather, it is used to estimate the overall effect of the many policies, goals, and strategies of Connect SoCal.</p> <p>Growth projections at the jurisdiction level or smaller geographies, including TAZ, are utilized to conduct required modeling and generally illustrate how regional policies and strategies may be reflected at the neighborhood level. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives based on any numbers within or aggregates of Connect SoCal 2024 projections at any geographic level.</p>

ID	COMMENT	RESPONSE
Submitted by	Hills for Everyone	Submittal 0001763
0001763.01	<p>Hills For Everyone (HFE) submits these comments on the 2024 Draft Regional Transportation Plan and Sustainable Communities Strategy (collectively Connect SoCal) and its environmental document, the Program Environmental Impact Report.</p> <p>By way of background, HFE is a 47-year-old non-profit organization that established Chino Hills State Park (CHSP) and is still working to conserve the remaining natural lands in the Puente-Chino Hills Wildlife Corridor at the juncture of Los Angeles, Orange, San Bernardino, and Riverside Counties.</p> <p>Our comments on the 2024 Draft Connect SoCal (the Plan), the Land Use and Communities Technical Report, the Project List, and the Program Environmental Impact Report and Statement (PEIR) are sectioned below by document, then chapter, page, and the referenced material (often with a quote), followed by our comments.</p>	Comment noted.
0001763.02.1	<p>Chapter: 1 - Executive Summary</p> <p>Page: 10</p> <p>Reference: "Urbanization continues to consume farmlands and open spaces, which contributes to the loss of groundwater supply and habitat areas that play a critical role in strengthening the region's resilience. SCAG will collaborate with federal, state, and local partners to ensure that the implementation of the Plan helps address existing air quality challenges, preserve natural lands, and reduce GHG emissions." (emphasis added with underline)</p> <p>Comment: The document states only 1,891 acres of habitat are anticipated to be improved across six counties even though the goal is resource efficiency and we know that the population is declining (See Land Use and Communities Technical Report, page 44). Please explain how natural lands will be preserved over the life of the Plan.</p> <p>Page: 12</p> <p>Reference: The Plan lists the environment as one of its four core goals, along with economy, communities, and mobility.</p> <p>Comment: HFE is pleased to see the environment listed as one of the four core goals of the Plan. Acknowledging the interconnectedness of the community, economy, and mobility provides opportunities for improved planning.</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>

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0001763.02.2	<p>Page: 13</p> <p>Reference: "SCAG's work helps facilitate implementation, but the agency does not directly implement or construct projects or have land use authority."</p> <p>Comment: We agree, however SCAG has the regional leadership, experience, and clout to facilitate cross-county and regional projects on policies and programs such as the Regional Advance Mitigation Program (RAMP) and tools like the SoCal Greenprint. Since the RAMP Policy Framework was adopted last spring, we recommend focusing strategies and mitigation measures on the implementation of the RAMP.</p>	<p>Comment noted. Please refer to the implementation strategy included in Section 6.3 of the Land Use and Communities Technical Report stating "Work with implementation agencies to support, establish, or supplement voluntary Regional Advance Mitigation Programs (RAMP) for regionally significant transportation projects that help mitigate environmental impacts and reduce per-capita Vehicle Miles Traveled (VMT), and provide enhanced data on mitigation opportunities through the Intergovernmental Review Process."</p>
0001763.03	<p>Chapter: 2 – Our Region Today</p> <p>Page: 35</p> <p>Reference: "By the year 2050, the region is projected to face numerous challenges and pressures due to climate change, including heightened risks of intense wildfires, droughts, extreme heat, extreme rain, rising sea levels and seismic events. The region is already experiencing extreme climate-related events more frequently, such as air-quality degradation, inland flooding, the destruction of homes and infrastructure from wildfires, landslides from torrential rainstorms, coastal flooding from sea level rise, and urban heat island effects from unusually high temperatures."</p> <p>Comment: The document fails to make the connection between climate change "challenges and pressures" and tangible impacts to actual Southland residents. Impacts aren't just to houses or roads, but people too. Only one sentence was included that connects people to high heat days. Looking at just wildfire: People endure evacuation, loss of time at work, immediate need for supplemental housing in case of housing loss, lack of basic needs following a fire (i.e., clothes, medication, food), and lack of communication ability (due to the loss of power, phone service or cell towers). Further, the lack of adequate evacuation routes, lack of redundant water system, coupled with power outages during high heat/high wind days—all have detrimental effects on people, their stress levels, and create trauma experiences. These climate-related events may happen in the region, but people live in the region and experience these impacts. The "safety of neighborhoods" isn't enough, thus we recommend the safety of people be considered. The connection between the impacts and people should be drawn more substantially.</p>	<p>Comment noted. In general, Connect SoCal 2024 takes a 30,000-foot level view of the region—its infrastructure, systems and its challenges. The impacts to residents are not detailed in this document due to the Plan's focus on this higher altitude, not because of any lack of importance nor substantiation—since residents throughout the region have already experienced the trauma of wildfire and other climate hazards.</p> <p>SCAG's Climate Change Action Resolution 21-628-1 recognizes the tangible impacts to residents from climate hazards such as but not limited to respiratory health. For Connect SoCal 2024, the 'Climate Resilience' Regional Planning Policies and Implementation Strategies included in Chapter 3 articulate policies for implementing agencies and actions for SCAG, respectively, to minimize negative impacts to people in the region from climate change.</p>
0001763.04	<p>Page: 36</p> <p>Reference: "Resilience is defined as the capacity of the SCAG region's built, social, economic, and natural systems to anticipate and effectively respond to changing conditions, acute shocks and chronic stressors by creating multiple opportunities for a sustainable, thriving and equitable future."</p> <p>Comment: The connection between cause and effect hasn't been clearly defined. Again, using wildfires as an example: wildfires burn habitat, then when it rains, this typically causes a secondary impact of mudslides and debris flows to the same neighborhood impacted by the original shock. Further, a shock can create to a chronic stressor. And, improving resilience means challenging outdated thinking and planning strategies, and using new and updated science and tools (like Wildfire Modeling). We urge SCAG to make the connection between cause and effect.</p>	<p>Comment noted. The compounding impacts of climate hazards is addressed in Section 3.3 in the Land Use and Communities Technical Report. Additional discussion on the compounding impacts of climate change has been added to Sections 3 and 4 of the Land Use and Communities Technical Report.</p>

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0001763.05.1	<p>Chapter: 3 - The Plan Page: 36 Reference: "Shocks are sudden and acute events that threaten immediate safety and well-being, such as earthquakes and wildfires. Stressors are chronic challenges that weaken built, social, economic and natural systems, including persistent air-quality issues or transportation system disrepair." Comment: Some non-profits, neighborhoods, and cities/counties are planning for shocks and stressors right now. For example, the Carbon Canyon Fire Safe Council developed materials for evacuation routes for every neighborhood in the small enclaves of Olinda Village and Sleepy Hollow, in partnership with the City of Chino Hills and Chino Valley Independent Fire Authority. SCAG can and should develop pilot programs and policies that improve public safety by addressing shocks and stressors like the strategies mentioned here.</p>	<p>Comment noted. Connect SoCal's implementation strategy to advance the Regional Planning Policies included in the Land Use and Communities Technical Report is listed in Section 5 and includes: "Monitor and pursue funding opportunities that can foster sustainable and equitable land use and development across the SCAG region. Explore the feasibility of creating a pilot grant program to support local planning and/or implementation". Additionally, Section 6 includes the implementation strategy to "Research existing and potential options to fund the climate resilience efforts of implementation agencies".</p>

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0001763.05.2	<p>Page: 103</p> <p>Reference: "SCAG's approach of de-emphasizing growth in areas with the highest number of convergences is sensitive to market considerations. Further, the preservation and restoration of Green Region Resources Areas (GRRAs) can reduce risks from climate change and promote future resilience in the region." Comment: We support SCAG's goal to prioritize 15-minute cities and avoid development in the GRRRA. However, it should be clarified as to why the Land Use and Communities Technical Report anticipates a loss of 48,000+ acres of natural lands and 8,100+ acres of farmland, if as Connect SoCal states, reducing the development potential on natural and farmlands is so important. The connection isn't being made about protecting GRRAs and this anticipated massive loss of undeveloped lands. This needs more clarity and clearly improved mitigation measures to reduce the impacts.</p>	<p>The Regional Growth Forecast for Connect SoCal 2024 was developed using GRRAs (including natural and agricultural lands) as a foundation for allocating future growth. These projections were then reviewed at the neighborhood level (i.e. Transportation Analysis Zone (TAZ)) by local jurisdictions, as they are the implementing agencies for land use. As shown in Section 5.5 of the Land Use and Communities Technical Report, Connect SoCal 2024 anticipates more growth in areas with no GRRAs or 1 GRRRA than Connect SoCal 2020.</p> <p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>

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0001763.06	<p>Page: 103-104 Reference: GRRRA categories: Flood Areas, Coastal Inundation (Sea Level Rise), Wildfire Risk, Open Space and Parks, Endangered Species and Plants, Sensitive Habitats, Sensitive Habitat Areas, Natural Community and Habitat Conservation Plans, Tribal Lands, Military Installations, and Farmlands. Comment: We strongly feel that based on the topographic, tectonic, history of liquefaction, and general land movement that "Unstable Landforms" is missing from the list of topic areas. Landslides are already a problem along the Coast as they relate to transportation infrastructure like rail lines and this is exacerbated by climate change. For example, the Orange County Transportation Authority has issued alerts related to the South Coast Rail emergency (See the OCTA Press Release from August 2023). The Authority has had to shut down service to San Diego County due to slope failures. That said, inland areas also face landslide issues. Some of these are exacerbated by the combination of rains and wildfire, but sometimes not. The SCAG region should include not only slope failures, but draw the connection to loss of life, property, and all forms of infrastructure. (See La Conchita Landslide PowerPoint [Ventura County], Bluebird Canyon Landslide [Orange County], and the U.S. Geological Survey's PDF on Landslides [Southern California].)</p> <p>Page: 104 Reference: Open Space and Parks Comment: HFE supports use of the California Protected Areas Database and the California Conservation Easement Database.</p> <p>Page: 104 Reference: Endangered Species and Plants Comment: This reads as though plants are not species. We suggest changing the category header to read: Endangered Flora and Fauna or simply calling it Sensitive, Threatened or Endangered Species.</p>	<p>Comment noted. Data layers for Green Region Resource Areas (GRRAs) help satisfy the requirements from SB 375 to consider "resource areas" in the development of the Forecasted Regional Development Pattern, which do not include landslide and liquefaction areas. This is an area for further study, and will be subsequently considered in the 2028 plan. With regard to the inclusion of data on "Endangered Species and Plants" this is an error and should be referred to as "Rare, Threatened and Endangered Species and Plants", as cited in Section 5 of the Land Use and Communities Technical Report.</p>

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0001763.07	<p>Page: 107</p> <p>Reference: "Natural and Agricultural Land Preservation: Preserving natural and agricultural lands can strengthen our communities, improve essential resources like our air, water and food, protect and enhance biodiversity, and capture greenhouse gases instead of allowing them to concentrate in the atmosphere." Comment: We appreciate that natural lands and agricultural lands are identified as having these local and regional benefits. We are concerned that with only 1,891 acres projected for improvement, this number doesn't meet the policy objective. Further, the mitigation measures in the PEIR also do not support this stated goal of natural and agricultural land preservation especially considering the PEIR notes the loss of these lands is "significant and unavoidable."</p> <p>Page: 109</p> <p>Reference: A footnote states that the Regional Advance Mitigation Programs or RAMP was "previously a mitigation measure in the Connect SoCal 2020 PEIR (SMM BIO-2). In this cycle, the RAMP has been elevated to a plan feature, which reduces impacts."</p> <p>Comment: The PEIR indicates plan features "may reduce impacts" (pg. 3-3 and 3-8). In reality, RAMP actually does reduce impacts, it also delivers projects faster, under budget, with streamlined permitting, using less staff time, more wisely using taxpayer dollars, encouraging collaborations among agencies, natural resource/permitting entities, and the conservation community, and with a stronger investment in landscape level conservation outcomes. See the OCTA Environmental Mitigation Program, which has preserved 1,300 acres and restored 350 acres and the Western Riverside Regional Conservation Authority, which includes a 500,000 acre habitat reserve. This is why we remain concerned about the lack of habitat improvements under Connect SoCal. The 1,891 acres identified as "improved" pales in comparison to the successes found elsewhere—with agencies that have deployed a RAMP. SCAG has the adopted policy framework, it should now be used instead of sitting on a shelf gathering dust.</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>
0001763.08.1	<p>Page: 119</p> <p>Reference: The document states "encourage the protection and restoration of wildlife corridors."</p> <p>Comment: We support this in concept, but considering SCAG has a considerable role with regional transportation projects in Connect SoCal, SCAG should be more than "encouraging" wildlife corridors. What exact steps will be taken to protect and restore wildlife corridors? How will the needs of wildlife corridor protection be prioritized? How will it be funded? Can wildlife corridors be identified? Can funding be secured to protect or enhance the impacted corridors?</p>	<p>Comment noted. SCAG was recently awarded a Sustainable Agricultural Lands Conservation grant from the Strategic Growth Council that will examine the economic and non-economic benefits of natural and agricultural lands, including the groundwater recharge implications of new development in these areas. A key piece of this work is developing tools for local agencies to implement best practices in the protection and restoration of natural lands. Additionally, SCAG tracks and provides comments on development projects through the Intergovernmental Review Program, which helps to monitor infrastructure in the context of natural land assets.</p>

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0001763.08.2	<p>Page: 119</p> <p>Reference: Policy 62 "Encourage the protection and restoration of natural habitat and wildlife corridors."</p> <p>Comment: We support this policy, but don't understand how it will be implemented and tracked. This should be clarified.</p>	<p>Comment noted. SCAG was recently awarded a Sustainable Agricultural Lands Conservation grant from the Strategic Growth Council that will examine the economic and non-economic benefits of natural and agricultural lands, including the groundwater recharge implications of new development in these areas. A key piece of this work is developing tools for local agencies to implement best practices in the protection and restoration of natural lands. A key piece of advancing this work is securing resources and providing grant support for implementation agencies to advance conservation outcomes in the region, and regularly sharing information on opportunities with stakeholders at our Natural and Farmlands Conservation Regional Planning Working Group. Additionally, SCAG tracks and provides comments on development projects through the Intergovernmental Review Program, which helps to monitor infrastructure in the context of natural land assets.</p>
0001763.08.3	<p>Page: 178 and 181</p> <p>Reference: Rural Land Consumption (also called Greenfields) is anticipated to be reduced 48% from the baseline.</p> <p>Comment: How is 48% of land consumption being reduced if only 1,891 acres end up improved in a 25-year plan. The numbers don't add up.</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>

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0001763.09	<p>Section: Glossary Page: 211 Reference: NIMBY Comment: This term is defined in the Glossary, but isn't used in the document. Further, often times residents that simply engage on community issues are attacked for speaking out are called NIMBYs. This is a derogatory word used to limit public participation and negate/ignore comments made by those that engage in the public process. It focuses on the name calling instead of the substance of the comment. It should be removed from the Glossary.</p>	This term has been removed from the Glossary.
0001763.10.1	<p>Section: 2.5.3 – Pathways to 30x30 Strategy Page: 7 Reference: This section describes the goal to protect 30% of California's lands and waters by 2030. Comment: The link should be made that Pathway #5 is Advance Mitigation under the Pathways to 30x30 document. In short, a policy framework that SCAG has adopted, can help California achieve 30x30. Yet, the Plan falls short because RAMP isn't implemented in this RTP/SCS, nor is active conservation a mitigation measure. This should change.</p>	Section 2.5.3 in the Land Use and Communities Technical Report is being amended to specifically mention advance mitigation. Also, advance mitigation is further discussed in Section 4.1. Section 6.3 also includes an implementation strategy for SCAG to "Work with implementation agencies to support, establish, or supplement voluntary RAMP and other approaches to more effectively address impacts for projects that support reduction of per-capita vehicle miles traveled". Further, Regional Advance Mitigation is included as a Regional Strategic Investment in Connect SoCal 2024.
0001763.10.2	<p>Section: 3.3 – Climate Hazards Page: 13 Reference: "Economic costs from wildfires include resources involved in fighting the fires, damage to property, health care bills, costs of disrupted business, lost tax revenue, and decreased property values, and are estimated to sum to \$10 billion dollars in 2020." Comment: There is no mention of the human toll due to wildfires, the trauma, the individual financial burden, the stress, etc. Further, as additional fires occur, more insurance issues will be faced by homeowners that live in GRRRA, which have a higher wildfire risk potential than other areas. There is no mention of this skyrocketing homeowner cost and how it actually impacts home production if the builder and future homeowners can't secure wildfire coverage (which leads to not being able to secure a home loan). Section: 4.1 – Social, Economic, Natural and Built Environment Challenges Page: 14 Reference: "New growth in the region can occur in a fashion that also promotes resource conservation." Comment: Yes, but how is this possible when more natural and farmlands are converted to urban uses with Connect SoCal than without? Section: 5.1 – Building a Regional Growth Vision Page: 23 Reference: Bullets 1 and 2 Comment: HFE supports growth in Priority Development Areas and the reduction of growth in GRRRA.</p>	Section 3.3 in the Land Use and Communities Technical Report now includes discussion of the human toll of climate change. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.

ID	COMMENT	RESPONSE
0001763.11.1	<p>Section: 5.3 Green Region Resource Areas Guiding The Forecasted Regional Development Pattern</p> <p>Page: 28</p> <p>Reference: Implementation Strategies</p> <p>Comment: We support the implementation strategies to create protected natural lands, secure wildlife corridors, and fund pilot programs. We just don't understand why there is so little actually protected under the Plan, if these are the implementing strategies. More needs to be done to offset the significant loss of agricultural and natural land across the region, such as expanding partnerships, coordinating with state conservancies and local land trusts to implement the strategies that also align with 30x30 strategies, and collaborating on funding this work across the public/private sector.</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>
0001763.11.2	<p>Page: 30</p> <p>Reference: Flammable "wildfire" vegetation references and Wildland Urban Intermix zone</p> <p>Comment: We encourage SCAG to use already adopted and recognized terms. For example: Wildland Urban Interface, which is defined by the US Fire Administration as: "the zone of transition between unoccupied land and human development." Further, while wildlands do burn, wildlands burn at a lower BTU (British Thermal Unit) than a home. US Geological Survey Researcher Jon Keeley notes: "houses burn houses down." (See The Best Wildfire Solutions We Are Not Using)</p>	Comment noted.

ID	COMMENT	RESPONSE
0001763.11.3	<p>Section: 6.2 Climate Resilience Page: 40</p> <p>Reference: "One of the primary ways that SCAG supports local agencies and stakeholders in these efforts is through assisting with local climate adaptation planning. Climate adaptation planning allows communities to better understand the specific local impacts of climate change they can expect and what the community's vulnerabilities are so that they can establish and implement strategies to proactively address them."</p> <p>Comment: We encourage SCAG to add implementing or mitigation measures that proactively combat climate change that simultaneously improve the environment such as: development buffers, native plant installation, and climate planning. SCAG should take a leadership role and develop case studies or pilot programs it funds to track climate reduction goals across the region.</p>	<p>Comment noted. SCAG's role in supporting local climate planning is primarily through the following ways: collaboration, funding administration, research, and helping to secure resources for greenhouse gas reduction and climate adaptation efforts. While SCAG can support local agencies and stakeholders through such efforts as those described, it is outside of SCAG's authority to directly implement climate action measures stemming from local climate action plans. SCAG is developing programming to lead on climate issues as part of the Climate Change Action Resolution approved by the Regional Council in January 2021.</p>
0001763.12.1	<p>Page: 40-41</p> <p>Reference: "Many of the greatest environmental challenges facing the SCAG region, such as increasingly hot temperatures, poor air-quality, and wildfire can be partially or fully addressed by incorporating natural features or processes into the built environment. Known as "nature-based solutions," these approaches are gaining traction in cities and communities around the world as strategies for adaptation and resilience to climate change, while providing social and economic co-benefits. Examples of nature-based solutions range from anything as simple as conserving existing natural lands, expanding urban tree canopy, to complex infrastructure projects such as reconstructing wetlands." (emphasis added with underline)</p> <p>Comment: Nature Based Solutions typically define solutions for modified natural environments, this section defined the focused only on the built environment. Therefore, this section should also recognize the natural environment.</p>	<p>Comment noted. The discussion of nature-based solutions contained in the Land Use and Communities Technical Report includes the reconstruction of wetlands as an example, which is meant to emphasize the role of stewardship of the natural environment as a viable strategy to respond to the impacts of climate change. While the Plan's strategies related to nature-based solutions are primarily focused on the built environment, the Plan emphasizes the importance of the natural environment and its conservation to efforts to increase the resilience of the region and prepare for the shocks and stressors associated with climate change.</p>

ID	COMMENT	RESPONSE
0001763.12.2	<p>Section: 6.3 – Natural and Farmlands Preservation Page: 43 Reference: "With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 18,032 acres of degraded habitat - 1,202 acres more than the Trend/Baseline." Comment: Why are more natural and farmlands converted to urban uses with Connect SoCal than the baseline?</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>
0001763.12.3	<p>Page: 43 Reference: "Connect SoCal envisions Regional Advance Mitigation as a key pathway for natural and agricultural lands preservation, which is included as a Regional Strategic Investment that can support conservation as a means of mitigating the environmental impacts of transportation investments." Comment: We support RAMP as a key pathway for land preservation. SCAG must take the critical next step to begin collaborating for implementation to take advantage of the 25-year horizon associated with this plan. Enabling language for RAMP should be included as a policy, implementing measure, or mitigation measure.</p>	<p>An implementation strategy for regional advance mitigation programs is included in the Plan on page 132.</p>

ID	COMMENT	RESPONSE
0001763.12.4	<p>Page: 44</p> <p>Reference: "With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 18,032 acres of degraded habitat - 1,202 acres more than the Trend/Baseline. Some areas are improved, however, as Connect SoCal will result in 1,891 acres of improved habitat - 666 acres more than the Trend/Baseline."</p> <p>Comment: We do not understand how the Plan intends to protect GRRAs, focus development in PDAs, and yet 18,032 acres of degraded habitat and only 1,891 acres will be improved. The math doesn't add up. This seems like a bigger impact than actual savings.</p>	<p>SCAG has updated the results for the Scenario Planning Model Conservation Module, which are identified in Table 3 of the Land Use and Communities Technical Report. This update includes updates to the underlying data sources, including the use of the California Department of Conservation's Farmland Mapping and Monitoring Program, as well as corrections to the Module's inputs related to agricultural employment which previously triggered the reclassification of land from agricultural to urban.</p> <p>This update yields improvements in some projected outcomes from Connect SoCal 2024. Overall, there is still projected loss of farmland and natural lands in the plan as a result of SCAG's locally informed Forecasted Regional Development Pattern. This is due to growth distributions at the local level that are consistent with local growth assumptions and municipal general plans. Additional plan benefits, in terms of reduced loss of farmland and natural lands, can be achieved through successful application of the Connect SoCal 2024 "Natural and Agricultural Lands Preservation" Regional Strategic Investments, Regional Planning Policies and Implementation Strategies. See Chapter 3 of the main document for more details.</p> <p>For reference, improved and degraded habitat areas analyses identify habitat areas of about 700 species identified from California Wildlife Habitat Relationships (CWHR) range map, which is a predictive model that lists terrestrial vertebrate species predicted to occur in a given location under certain habitat conditions. In comparison, the California Natural Diversity Database includes terrestrial vertebrates, as well as plants, fish, invertebrates, and rare natural communities that carry special status. The Scenario Planning Model Conservation Module estimated the acres of habitat areas improved or degraded from the base year using factors related to species reproduction, cover, and feeding. Anticipated outcomes from Connect SoCal 2024 that show acreage of improved or degraded species suitability within the CWHR range map areas is not to be understood as total acres improved or degraded for the entire habitat areas available or identified in the region.</p> <p>Agriculture and natural lands converted to urban uses is calculated by examining growth at the parcel and zonal levels. If households and non-agricultural employment exceed roughly half of the size of an area, based on assumptions of space needed to accommodate various types of housing as well as jobs based on their associated sector, the area is deemed to have been developed into an urban use.</p> <p>Greenfield land consumption measures areas utilized to accommodate new housing and jobs. Greenfields are defined as areas where intersection density is less than 45 per square mile and development density is below 4.5 units per square mile in the existing conditions (as calculated by adding housing and employment together divided by gross acres of the impacted area).</p>
0001763.13	<p>Section: 6.4 – Complete Communities</p> <p>Page: 47</p> <p>Reference: "List of tools that support realization of complete communities."</p> <p>Comment: We support the addition of a Public Safety Component similar to that under consideration in Los Angeles County related to wildfire zones. (See Wildfire Protection Ordinance) This is one way SCAG can help support reducing development in the GRRAs and ensure smarter land use decisions in Very High Fire Hazard Severity Zones.</p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001763.14	<p>Section: The Project List Table Page: 429 Reference: "Advance Mitigation/Other" Comment: RAMPs are by their very nature focused on early permitting and project streamlining in advance of the project(s) actually being completed. With a 2050 completion timeframe for this plan, none of the mitigation will have been "advance" mitigation, which defeats the purpose of a RAMP entirely. We urge SCAG to identify implementation opportunities and collaborate with agencies to make RAMP a reality.</p>	<p>Comment note. The 2050 completion date reflects the potential expenditures through 2050 and not starting in 2050.</p>
0001763.15	<p>Section: Executive Summary Page: ES-7 Reference: Environmental Goals Comment: How does SCAG meet its environmental goal when 48,000+ and 8,100+ acres of natural and farmlands, respectively, are lost by 2050? It seems the environmental goal doesn't achieve anything. If it did meet the goal, this number would be considerably better.</p> <p>Section: Aesthetics Page: ES-18, 3.1-23 Reference: "SMM-GEN-1: SCAG shall continue to facilitate interagency cooperation, information sharing, and regional program development, such as through existing planning tools to support local jurisdictions including various applications offered through the SCAG Regional Data Platform (RDP), SoCal Atlas, HELPR, and other GIS resources and data services. For more information or assistance, please contact SCAG's Local Information Services Team (LIST) at list@scag.ca.gov." Comment: The SoCal Greenprint should be added to this mitigation measure as it is a tool offered by SCAG.</p> <p>Section: Agricultural Page: ES-21 and 3.2-15 Reference: The Regional Greenprint Comment: HFE supports the SoCal Greenprint and has ever since SCAG committed to developing it in its 2020 PEIR as SMM-BIO-2. (See 2020 PEIR, pg. 3.4-71)</p> <p>Section: Biological Resources Page: ES-35, 36, 37 and 3.4-44, 45 Reference: PMM-BIO-4(k) states, "Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat)." Comment: This mitigation measure should be expanded to include fee title acquisition and/or restoration of lands and waters.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-7 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
Submitted by	House Farm Workers	Submittal 0001717

ID	COMMENT	RESPONSE
0001717.01.1	<p>Thoughts on Connect SoCal Overall</p> <ul style="list-style-type: none"> • Provide non-profits with funds or develop a SCAG program to educate priority populations on current low-income housing opportunities and how to apply. Countywide interactive/ or quarterly updated tracking sheet of apartment locations and contact information. I do this, and many of the people we advocate for do not know that there is low-income housing available. 	<p>Comment noted. SCAG seeks to continue to collaborate with partners across the region, including community based organizations, to understand programming needs across the region and potential technical assistance opportunities as part of our regional housing planning efforts.</p>
0001717.01.2	<ul style="list-style-type: none"> • Create funding (not waitlists or gatekeeper programs that decide who needs to be sheltered) for temporary housing or temporary housing vouchers for priority populations, disadvantaged community members, and persons fleeing violence during the search for stable low-income housing opportunities 	<p>Comment noted. SCAG continues to support efforts that establish funds to support low-income housing and provide more accessible and more efficient shelters.</p>
0001717.01.3	<ul style="list-style-type: none"> • Community organizing- educational events, town halls, and lesson plans to inform communities about potential projects. Incentives for community members to share housing stories. Mediation meetings between advocates and opposition. Staff reporting at City Council, Planning Commission and other opportunities to get projects approved. Provide a SCAG and HCD connection with a quick response time for advocates to reach out to when they run into issues with a city or cities to reach out to when they run into an issue with an advocate that is available to respond to all parties in writing, by Zoom, or in-person as needed. 	<p>SCAG seeks to continue to engage and support partners across the region in housing activities and seeks to expand opportunities to collaborate and engage.</p> <p>In addition, the California State Department of Housing and Community Development formed the Housing Accountability Unit to hold jurisdictions accountable for meeting their housing element commitments and complying with state housing laws through education and technical assistance or more dire consequences for consistent violations.</p>
0001717.01.4	<ul style="list-style-type: none"> • Location of available land, zoning research, advocacy for a zoning change, surveying of local populations to determine the type of needed housing (senior, farmworker, low-income, student, other) and size of units/amenities needed. It could be a team grant for a Non-Profit and Developer or Land Trust. This is something we thought about applying for a SCAG grant to do, but after having an initial application meeting, we realized it would be hard to qualify for, even though it would have resulted in creating housing. 	<p>Comment noted. As part of its REAP program, SCAG developed a call for projects specifically intended for CBOs to elevate discussions on equity as part of municipal land use decision-making. SCAG will continue to explore impactful ways to engage and directly fund CBOs, community land trusts, and other grassroots efforts as part of its overall housing program.</p>
0001717.02.1	<ul style="list-style-type: none"> • Priority population surveying: getting actual numbers of how many people are in a demographic and what type of housing they need (administrative staff and incentives needed) County-wide, in-person count without estimation – count every person, similar to the homeless survey done in Ventura, CA. 	<p>The third paragraph under the section Key Community Challenges is changed to read "A recent comprehensive study on the California homelessness crisis found that the majority (89 percent) of unhoused persons lived in California prior to becoming unhoused. The top three economic reasons include lost or reduced income, housing costs were too high, or person was stolen from or was the victim of a scam while the top three social reasons include conflict among residents, person didn't want to impose/wanted own space, and conflict with property owner."</p>
0001717.02.2	<ul style="list-style-type: none"> • Transition from low-income housing to market rate programs- 6 month – 12 month help with utilities, food, transportation and other service you usually lose when moving out of low-income housing. Many families decide not to advance and deny promotions in fear of losing their housing and not being able to afford the market rate rents. 	<p>Comment noted. SCAG will continue to explore strategies to increase housing supply and diversify housing types in communities with high displacement risk so that the households can continue to stay in their communities as their economic status change.</p>

ID	COMMENT	RESPONSE
0001717.02.3	<p>• Additional Rural area transit options. In Ventura County, look at opening the railroad from Santa Paula to Piru, with stops in Fillmore, and extend the VCTC Blue Bus that has a stop in Fillmore to unincorporated Piru while keeping any existing transportation. Ensure that senior ride-share programs make stops in rural areas and will transport them to the nearest doctor's office, which is sometimes outside of the County the senior lives in but is where they get their medical care. Look at where people in rural and unincorporated areas work/go to school, and if it is outside of their County, create a connection with the other County so that transportation has a mutual meeting place- or create funds and incentives for Counties to want to do all of this! Look at creating a no-stop bus from rural areas to County Universities, even if it is only twice a day. Also, look at the trolley used by Santa Barbara as a possible option to bring to other places; it is a low-cost option for the city and riders that offers a "pretty/touristy" ride but also covers areas where locals work. Funds for Rural / Unincorporated areas that are able to be used by the local neighborhood councils to improve or create sidewalks, bike paths, walkways, and classes to teach them how as needed. Offer free bikes to rural and disadvantaged communities to use the newly created bike paths after they have completed a bike safety class, or fund a Non-Profit or Neighborhood Council to teach the class and distribute the bikes (ensure they provide quality bikes and enough bikes for all community members). Help Rural areas get needed services- to lower transit, encourage programs that help with utility costs, food stamp applications or food pantries to have a monthly spot in a rural community that is after the community members working hours.</p>	<p>Comment noted. The Mobility Technical Report covers numerous strategies to encourage and support walking, biking, using micromobility, and riding transit/rail. SCAG provides and facilitates funding opportunities, such as the state/regional Active Transportation Program, to support projects and plans that contribute to reducing vehicle miles traveled (VMT) and greenhouse gas emissions (GHG). SCAG also convenes stakeholders on a recurring basis to discuss regional plans and projects, best practices and innovations, regulatory compliance including performance measures, and other timely topics. These specific groups include the Regional Transit Technical Advisory Committee, which is comprised of dozens of transit/rail operators, and a Safe and Active Streets Working Group, which is comprised of transportation safety and active transportation practitioners from throughout the SCAG region.</p>
0001717.03.1	<p>Thoughts with page number Page 11 – Mobility "These alternatives include regional commuter rail, light rail and the bus network. However, more work is needed to better manage both the viability and reliability of the transportation system and consumer demand for it." And Page 95 "The regional transit priority network is intended to enable enhanced transit services, improved mobility, accessibility and sustainability." The transit has to be as easy, timely and available as individual transportation while being cheaper so that people want to do it. Other incentives could be updated transit that has charging stations, laptop trays, bathrooms, reclining seats or other things that allow people to be comfortable and productive while using it.</p>	<p>Comment noted. Connect SoCal envisions a future in which transit functions as the backbone of our mobility ecosystem enabling seamless and efficient travel without needing to own an automobile. This includes ensuring frequent, reliable, and convenient transit/rail. The Mobility Technical Report discusses transit/rail in detail including strategies to support improved transit/rail across the region, including a regional network of mobility hubs where modes intersect (in particular, transit/rail) and that include amenities such as EV car charging stations, restrooms, etc.. These mobility hubs are meant to support seamless transfers and travels cross all modes (e.g., car share, bike share, microtransit, etc.).</p>
0001717.03.2.1	<p>Page 12 – Environment "Southern California experiences significant air pollution that impacts public health and contributes to climate change. Climate change– related hazards are becoming more intense, with widespread regional impacts that include wildfires, drought, extreme weather and rising sea levels that negatively impact public health, welfare and the economy. "</p>	<p>Comment noted.</p>
0001717.03.2.2	<p>Classes on how transportation relates to climate change in high school or as a requirement when applying for a license. Having a So-Cal video that advocates can show.</p>	<p>Comment noted. SCAG's Go Human program hosts a call for community-driven projects focused on various themes, and the 2024 grant program, "Community Streets," is focused on implementing traffic safety strategies through community engagement projects. Engagement activities, such as classes, videos, and other educational materials, that explore the relationship between transportation, climate change, and other key topics, such as roadway safety and community resiliency are aligned with the grant program.</p>
0001717.03.3	<p>Page 34 "remains unconnected. Currently, 10 percent of residents across the region lack broadband. This disparity is more pronounced in certain populations. For example, the lack of broadband rises to 20 percent of adults aged 65 and older—and 70 percent of those without internet are concentrated in low-income households." Connection is part of it, but having a laptop or computer with Microsoft software included, not just a Chrome book/tablet/iPhone, is also an issue.</p>	<p>Comment noted. The digital divide is multifaceted, with device scarcity being a significant factor. SCAG is dedicated to promoting digital equity and has formulated a Digital Action Plan that addresses the primary reasons for the digital divide, including device shortages. A copy of the Digital Action Plan is available at: https://scag.ca.gov/post/scag-digital-action-plan</p>

ID	COMMENT	RESPONSE
0001717.04.1	<p>“Most trips are occurring during the early afternoon and in locations associated with the rise of working from home and school pickup/dropoff.” And Page 95, “Safe Routes to School (SRTS)” People paid for others to do this for them, or had their kids walk home alone. There is an increase because it is now convenient, cheaper, and safer. Look at decreasing the distance from the school bus stop to school-aged kids' home addresses, and that might help parents send their kids on the bus. Also, some schools offer afterschool programs, but if the child participates, they can not take a school bus home. Look into creating a second bus ride option. Schools in Santa Barbara County have done this so the child gets off the bus around 5 – 5:30, close to when parents are off work.</p>	<p>Comment noted. Safe Routes to School plans and programs, which can be funded through the State and SCAG's regional Active Transportation Program, can assess how students travel to/from school and identify opportunities for physical and programmatic improvements, such as upgrading the safety and accessibility of walking and biking infrastructure and recommending new programs or adjustments to existing programs to better meet the various scheduling needs for students. In addition, the development of Safe Routes to School plans and programs can facilitate conversations between local jurisdiction staff, school district staff and parents/guardians, especially in cases where there is limited coordination across these key stakeholders.</p>
0001717.04.2	<p>“For the purposes of this Plan, SCAG is assuming roughly 22–25 percent of workdays will be conducted at home through 2050.” How can a credit or incentive be provided to the person working from home or the employer allowing them to? Work from home will be asked to go to in person meetings and conferences. Look at meeting locations used by corporations (Libraries, Conference Centers, Community Rooms, Banquet Halls). Are they central to the County?</p>	<p>Comment noted. SCAG supports the implementation of Transportation Demand Management (TDM) approaches including options to work remotely, as documented in Connect SoCal's policies and strategies and detailed in the Congestion Management Technical Report's TDM Toolbox. SCAG looks forward to partnering and supporting implementation that allows for the substitution of long-distance on-site work trips with shorter trips to neighborhood locations.</p>
0001717.04.3	<p>“Like electric vehicles and automated vehicles, as well as advancement in travel planning and safety systems, such as Mobility as a Service and Advanced Driver Assistance Systems.” and “The Advanced Clean Cars II rule requires that all new passenger cars, trucks and SUVs sold in California be zero-emission vehicles by 2035” Are there affordable electric vehicle models for all income levels?</p>	<p>Comment noted. Currently, the electric vehicle (EV) market offers a variety of models, with prices ranging from about \$27,000 for the Chevy Bolt to \$35,000 for the Tesla Model 3. After applying the federal tax credit, these prices can drop to between \$20,000 and \$28,000, making them comparable to similar Internal Combustion Engine (ICE) vehicle models. It's important to note that in addition to federal tax credits, there are numerous incentive programs offered by state and local governments. These programs can significantly reduce the upfront cost of purchasing an EV, often making them more affordable than new ICE passenger vehicles.</p>
0001717.04.4	<p>“Barriers such as high vehicle costs and inadequate supportive infrastructure for renters and public charging stations hinder the transition to EVs for the majority of SCAG residents.” We have seen the Housing Authority of San Buena Ventura include EV Charging stations at their low-income / farmworker properties. You would have to ask them if the residents use it, but requiring it, or creating an incentive in addition to existing incentives/funds is a way to prepare for 2035. There might also be an incentive to have the charging station cost to residents be looked at the same way USDA looks at a utility allowance.</p>	<p>Comment noted. Chapter 3 of Connect SoCal identifies implementation strategies for Clean Transportation that include investigating opportunities to install charging stations that can be used by multi-unit dwellers that don't have the same opportunities for charging as single-family homeowners, and facilitating development of charging infrastructure through public-private partnerships. Incentives could be considered as part of the assessment.</p>
0001717.04.5	<p>Page 51 Look at creating additional family compound housing where one lot can be shared by multiple generations. This could help families purchase a home together and not be over crowded.</p>	<p>Comment noted. SCAG continues to explore strategies to promote multi-generational housing and housing in place.</p>
Submitted by	Inland Empire Biking Alliance	Submittal 0001690
0001690.01	<p>Critical need to push active transportation improvements to be earlier in the planning periods(?). Whenever it might show up at some point in the future at some point when they finally get around to figuring out when to apply for a grant.</p>	<p>Comment noted. Planning projects funded through the Active Transportation Program, especially planning projects funded through SCAG's Sustainable Communities Program Active Transportation & Safety call for projects, are intended to prepare for implementation whether through grant funding or incorporation into workplans. SCAG funds plans through this call for projects that are focused on future implementation as they consider the feasibility of recommendations, including community support and alignment with local, regional, and statewide priorities.</p>
Submitted by	Los Angeles County Department of Regional Planning	Submittal 0001684
0001684.01	<p>Thank you for the opportunity to provide input on the Draft 2024 Connect SoCal Growth Forecast. As you know, the Department of Regional Planning's (County Planning) initial comments provided in 2022 were based on preliminary information from the County's Housing Element and information derived from approved and entitled development projects in the unincorporated areas of Los Angeles County.</p> <p>Since its initial data submittal, County Planning has advanced several implementation programs within its certified Housing Element through the preparation of various Area Plans. Several key development projects have either advanced through entitlements, been incorporated into the</p>	<p>As the county's letter had noted at the conclusion of the Local Data Exchange process in December 2022, it was likely that by early 2024 additional information would become available regarding the progress of several key development projects.</p> <p>Changes to entitlement information for the long-run (in this case, the 2035-2050 period) are one of numerous inputs to SCAG's growth forecasting methodology, which seeks to ensure a balance between regional and local expertise as well as a balance between future population, households, and employment. This means that all local changes are assessed in their regional context, and all changes are considered in terms of their impact on the relationships between jobs and people,</p>

County's Area Plans, or have otherwise been revised. As such, please consider this letter an update to our original data submittal.

County Planning acknowledges there are other considerations and factors that inform SCAG's methodology. Approved project entitlements, which provide housing dwelling unit counts and square footage projections for commercial and industrial development, may not be in perfect alignment with SCAG's methodology or its proposed growth forecast. Lastly, County Planning acknowledges that SCAG's methodology converts dwelling units into household projections and that you apply other factors, including vacancy rates, in this forecast. While County Planning tracks entitlements and planned projects based on housing units, we have attempted to remain consistent with SCAG's methodology and instead provide our requested revisions to households.

We offer the following revisions for your consideration:

Newhall Ranch

TAZ: 20224100; Proposed 2050 Households: 2,720; Proposed 2050 Employment: 12,296

TAZ: 20224200; Proposed 2050 Households: 2; Proposed 2050 Employment: 12,788

TAZ: 20226100; Proposed 2050 Households: 24,076; Proposed 2050 Employment: 37,765

TAZ: 20227100; Proposed 2050 Households: 7,000; Proposed 2050 Employment: 6,917

Centennial

TAZ: 20280100; Proposed 2050 Households: 18,173; Proposed 2050 Employment: 2,000

TAZ: 20281100; Proposed 2050 Households: 0; Proposed 2050 Employment: 21,675

For the aforementioned TAZs we do not recommended changes to the growth forecast for hh2019 to hh2035 or for emp 2019 to emp 2035. Instead, we recommend SCAG increase the number of households and increase employment projections exclusively in the 2035 to 2050 timeframe.

and people and housing.

Los Angeles County is the only one of the region's 197 local jurisdictions to note forthcoming changes prior to the 12/2/22 LDX deadline and follow-up with specific requests prior to the 1/12/24 Connect SoCal public comment deadline. As such staff are able to integrate this revision request, which covered total households and total employment in 6 Transportation Analysis Zones (TAZs) across two major developments (Newhall Ranch and Centennial) into the final plan.

In the case of Centennial, staff are able to directly increase 2050 households from the draft plan total of 12,050 to the requested amount of 18,173. Similarly, we are able to increase the 2050 employment total from 8,782 to 23,675. This results in a jobs-to-household ratio in the Centennial project area of 1.30, which is very close to the county-wide ratio of 1.31 we anticipate in 2050 and appears generally consistent with the principles which guided Regional Growth Forecast development.

In the case of Newhall Ranch, we are able to directly increase the 2050 households from the draft plan total of 23,761 to the requested amount of 33,798. However, increasing the 2050 employment from 37,854 to 69,766 resulted in a number of technical and practical challenges for the growth forecast and plan targets. In contrast, Connect SoCal 2020's horizon year of 2045 projected 29,057 total jobs across the four-TAZ Newhall Ranch project area and it is unclear what has led to such a significant change in the long-run outlook. More broadly, the draft plan anticipates 2019-2050 employment growth in all of unincorporated Los Angeles County to be only +29,400 jobs. The total requested increase across both projects would reflect a 260 percent increase in the SCAG Region's second-largest jurisdiction and would represent an extreme outlier.

Furthermore, the result of the change would engender an imbalance of jobs and housing with 2.06 new jobs per new housing unit—well above the countywide ratio. This is reflected in an analysis using SCAG's Scenario Planning model, which showed a 0.114% increase in Vehicle Miles Traveled (VMT) per capita in 2050 compared to the draft plan, suggesting that such a magnitude of employment growth would result in additional trip-making from further parts of the region, namely the LA basin.

Instead, in order to account for the increase request and maintain a consistent methodological approach across the region, the 2050 employment in the Newhall Ranch area was instead increased proportional to the requested increase in 2050 households using the aforementioned county-wide ratio of 1.31 new jobs per new household. This results in a 2050 employment total of 51,029 across the four-TAZ Newhall Ranch area.

The letter also requests that decreases to the household and employment growth projections in the South Bay planning area be made in acknowledgement that the impact of more growth in one location is not independent of growth elsewhere. However, upon review of the draft projections for the South Bay in further detail, only 1 percent of the projected household growth occurs in the 2035-2050 period requested, with the vast majority expected before 2035. Furthermore, employment growth in the planning area is expected to be extremely small (below 6 percent) over the entire 2019-2050 plan horizon. Rather than decreasing projections from an already low-growth area—especially after 2035—we proceeded to simply make additions to the two identified developments.

The net result of the changes using our Scenario Planning Model's 2050 VMT/capita across all of Southern California is an increase in 0.080% compared to the draft plan, and a reduction of the share of household growth in Priority Development Areas (PDAs) from 67% to 66%. However, this alone does not cause the region to miss its primary plan targets and is superior to the approach which included the full employment total requested.

0001684.02 To acknowledge that these requested increases do not occur in a vacuum, and upon further review of the growth forecast for other County Planning Areas, we also recommend an overall 25% decrease in household and employment growth projections in the South Bay Planning Area. SCAG may apply these reductions to the appropriate TAZs within this Planning Area.

Thank you again for the opportunity to provide additional comments. We support the work SCAG is doing in this arena and look forward to a continued productive working relationship.

Please do not hesitate to contact me at abodek@planning.lacounty.gov, or Connie Chung, Deputy Director, at cchung@planning.lacounty.gov.

Sincerely,
Amy J. Bodek, AICP
Director of Regional Planning

C: Sarah Jepson, Chief Planning Officer
Kevin Kane, PhD., Program Manager

As the county's letter had noted at the conclusion of the Local Data Exchange process in December 2022, it was likely that by early 2024 additional information would become available regarding the progress of several key development projects.

Changes to entitlement information for the long-run (in this case, the 2035-2050 period) are one of numerous inputs to SCAG's growth forecasting methodology, which seeks to ensure a balance between regional and local expertise as well as a balance between future population, households, and employment. This means that all local changes are assessed in their regional context, and all changes are considered in terms of their impact on the relationships between jobs and people, and people and housing.

Los Angeles County is the only one of the region's 197 local jurisdictions to note forthcoming changes prior to the 12/2/22 LDX deadline and follow-up with specific requests prior to the 1/12/24 Connect SoCal public comment deadline. As such staff are able to integrate this revision request, which covered total households and total employment in 6 Transportation Analysis Zones (TAZs) across two major developments (Newhall Ranch and Centennial) into the final plan.

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Submitted by	Los Angeles World Airports	Submittal	0001817
0001817.01	<p>Los Angeles World Airports (LAWA) staff appreciates the opportunity to comment on the Draft Connect SoCal 2024 Plan documents technical reports (Aviation and Airport Ground Access Technical Report, Goods Movement Technical Report and Project List Technical Report).</p> <p>Based on the review of the above-mentioned technical reports and associated sections, LAWA has the following comments:</p> <p>Aviation and Airport Ground Access Technical Report</p> <p>1. Section 2.4.3, Airport Terminal (E.G., Terminals, Customs, Gates) and Airside (E.G., Runways, Tarmacs) Planning: Airports and FAA: The text in the second paragraph reads "Airfield Terminal Modernization Project (ATMP)"</p> <p>LAWA requests the correction of text to "Airfield and Terminal Modernization Project (ATMP)."</p>	Comment noted. Narrative text will be edited.	
0001817.02	<p>2. Section 3.1.4 Los Angeles International Airport, LAX Passenger and Cargo Activity (Page 20): "Approximately 88 percent of travelers at LAX are O&D, and 22 percent are connecting passengers".</p> <p>The percentages, when combined total 110%, should the percentages be 78% O&D and 22% connecting? LAWA requests that SCAG confirm the passenger and O&D percentages.</p>	Comment noted. Narrative text will be edited to provide updated data/information. The sentence now reads "88 percent of travelers at LAX are O&D, and 12 percent are connecting passengers".	
0001817.03	<p>3. Section 3.1.4 LAX Operational Breakdown (2022 Data), SCAG indicates "the COVID-19 had no negative effect on air cargo demand at LAX".</p> <p>Although COVID – 19 did not have a negative effect on cargo, the positive effect that was seen in 2021 appears to be temporary based on the current downward trend (please refer to LAWA's current cargo tonnage report for 2023at https://www.lawa.org/-/media/05b9e2ae78474a09aedc620e903f92cc.pdf). LAWA requests that SCAG recognize this downward trend as described on page 32 and-33 of the "Goods Movement Technical Report". The Goods Movement Technical Reports acknowledges that COVID-19 Pandemic "did not have a lasting effect on air cargo demand at LAX" LAWA also recommends review of the forecast cargo tonnage to account for the substantial decrease observed between 2021 and 2023 during the post-COVID-19 recovery period.</p>	Comment noted. Narrative text will be edited to provide additional information. Page 41 now reads "Following 2010, air cargo experienced a boom, with air cargo demand hitting especially robust growth from 2012 onwards, followed by a downward trend beginning in 2021", and "In recent years, air cargo activity in the SCAG region has experienced a dramatic upsurge, including during the COVID-19 pandemic, however cargo activity in the region has begun trending down following the boost during the pandemic...air cargo in the SCAG region grew at an annual rate of 5.9 percent from 2017 to 2021, with air cargo activity eventually coming down from 3.95 million tons in 2021 to just over 3.7 million tons in 2022." On page 50, the following sentence was added, "However, by late 2021, air cargo demand in the region began to trend back downward towards 2019 levels". Finally, on page 61, the following sentence was added, "However, it should be noted that beginning in late 2021, the air cargo activity in the SCAG region has trended back downward towards the pre-pandemic surge".	
0001817.04	<p>4. Section 3.7.1, Environmental Initiatives: "LAX Sustainability Action Plan: LAWA employs a Sustainability Action Plan and adopted two Sustainable Design and Construction Policies in 2017".</p> <p>LAWA adopted four additional policies related to sustainability: LAWA EV Purchasing Policy (updated May 2022); LAX Ground Support Equipment [Reduction] Emissions Policy (Updated Oct. 2019); LAX Food Donation Policy (updated Sept. 2022) and Single-Use Plastic Water Bottle Phase-out Policy (updated March 2023). LAWA requests that SCAG consider referencing these additional policies.</p>	Comment noted. Narrative text will be edited to provide additional information.	

ID	COMMENT	RESPONSE
0001817.05	<p>5. Section 4.4, Estimating Base and Horizon Year Auto and Truck Trips (SCAG Modeling): Table 7. "(2019 Base Year) and 2050 (Horizon Year) Estimated Daily Auto and Truck Trips" identifies SCAGs estimated daily auto and trip trucks.</p> <p>LAWA requests a copy of SCAGs methodology and data used to forecast the daily truck trips for LAX as identified in Table 7.</p>	<p>Comment noted. SCAG staff will work with LAWA and the SCAG modeling team to provide data and methodology for estimated daily truck trips.</p>
0001817.06	<p>6. Section 6.1.1, Updating and Amending Airport Ground Access Projects: The second paragraph on page 70 states that "LAWA is completing LAMP and is in the initial stages of planning and environmental work for the Airfield and Terminal Modernization Project (ATMP)</p> <p>LAWA requests that SCAG reflect the current state of the ATMP. The California Environmental Policy Act (CEQA) for the ATMP was certified by the Board of Airport Commissioners in 2019 and is currently in the design and construction.</p>	<p>Comment noted. Narrative text will be edited to provide updated data/information.</p>
0001817.07	<p>7. Section 6.1 Plan Implementation Summary, Table 8: Airport Ground Access Projects from Main Project List: The Description for RTP ID 1160031 states "East Intermodal Transportation Facility"</p> <p>LAWA requests SCAG update language to "West Intermodal Transportation Facility".</p>	<p>Comment noted. Narrative text will be edited to provide updated data/information. RTP ID 1160031 (regarding LAX ITF-West) has been closed on the main project list and been reassigned to another non-LAX project. Thus, The row with LAX 1160031 "East Intermodal Transportation Facility" in Table 8 will be removed.</p>
Submitted by	Method Schools Corp	Submittal 0001678
0001678.01	<p>Riverside county, and particularly SW Rivco, is growing rapidly, unlike most of the other areas covered in this plan. Working with Brightline West to extend rail from Rancho Cucamonga south, through this area and into San Diego, makes sense. There is a station planned for Murrieta in the long-term CA HSR plan but I don't think most people believe that will ever happen. But, a private company (obviously very subsidized) working with local governments makes sense.</p> <p>Freeway expansion, while needed in many cases, seems to be less effective at reigning in traffic. I viable high speed rail network is the future of mobility in So Cal. In my eyes, anyway.</p>	<p>Comment noted. Connect SoCal includes Phase 1 of California High-Speed Rail, with a completion date of 2033. Connect SoCal also assumes Brightline West will operate high speed rail service between Las Vegas, the Victor Valley and Rancho Cucamonga by 2030.</p> <p>Connect SoCal includes policies and strategies to advance transit/rail across the region, including options that would take advantage of the freeway system. An example strategy: "Expand the region's dedicated lanes network—including new bus rapid transit, dedicated bus lanes, express bus service on managed and express lanes—as well as the region's urban and passenger rail network and transit/rail signal priority treatments. Improve transit/rail frequency, reliability, and fare and scheduling integration across operators."</p>
Submitted by	Naval Base Ventura County	Submittal 0001818
0001818.01	<p>This letter is in response to Naval Base Ventura County's review and comments on Draft Program Environmental Impact Report (PEIR) prepared for the Connect SoCal 2024 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The military operating areas under my command within the Southern California Association of Governments (SCAG) planning authority include Naval Base Ventura County (NBVC), which is comprised of three non-contiguous navy operating bases within Ventura County, California.</p> <p>NBVC shares similar transportation needs as other military installations in the SCAG planning region, in that defense readiness training operations and resilient military mobilization require a sufficient transportation network, so that cargo, oversized vehicles, and personnel can be moved as quickly and safely as possible.</p> <p>My staff and I have reviewed the Draft PEIR for the Connect SoCal 2024 RTP/SCS and provide SCAG our project comments and offer the following planning recommendations, below.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter FED-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001818.02	<p>Military installations, including NBVC, require safe and efficient transport of personnel and freight via the State's Strategic Highway Network (STRAHNET) and additional roadways that serve military sites. The PEIR should identify the STRAHNET, other roadways and intermodal facilities not included in the STRAHNET. SCAG should consider how increased congestion and land use changes may impact defense readiness, and the ability to respond to surge capabilities as the region continues to grow.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter FED-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001818.03	The impacts of relative sea level rise and storm surge have been recognized along the coast, making coastline vulnerable military facilities such as NBVC (Point Mugu and Port Hueneme) susceptible to storm surge threats, coupled with sea water intrusion and coastal floods impacting mission readiness. The PEIR should carefully consider the effects of climate stressors on the region's transportation networks; SCAG should integrate climate resilience adaptation programs and mitigation strategies for phasing implementation of Connect SoCal 2024 RTP/SCS.	For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter FED-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001818.04.1	Connect SoCal 2024 RTP/SCS and Draft PEIR should at a minimum include the following: 1. Include a map of all military installations and airfields in the SCAG planning region.	While not identified on their own, military installations were a factor in the development of Green Region Resource Areas that served as an input to Connect SoCal's Forecasted Regional Development Pattern (refer to Section 5 of the Land Use and Communities Technical Report). For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter FED-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001818.04.2	2. Include an overview of the roles that military installations have in the region, including a brief description of each installation's current and future mission(s), and land-use compatibility needs.	Comment noted. For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter FED-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001818.04.3	3. Ensure that the Strategic Highway Corridor Network (STRAHNET) and STRAHNET Connectors are identified on maps illustrating RTP/SCS Mobility Network across the SCAG planning authority. Discuss critical modes of access and transportation needs to the installation for both people and cargo.	For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter FED-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir The Highways for National Defense (HND) program within the Surface Deployment and Distribution Command Transportation Engineering Agency (SDDCTEA) of the Department of Defense performs studies of specific routes linking the most vital military installations with their respective seaports and airports of embarkation. These studies are referred to as Power Projection Platforms (PPP) Route studies. When a PPP Route study identifies the need to add a roadway to the STRAHNET, the HND in partnership with FHWA will coordinate with the state department of transportation and any applicable MPOs to process the inclusion into the National Highway System. SCAG's role is one of concurrence. Please see https://www.sddc.army.mil/sites/TEA/Functions/SpecialAssistant/Pages/HighwaysNationalDefense.aspx for the latest STRAHNET maps.
0001818.04.4	4. Include California Defense Spending and Economic Impacts Data published in U.S. Department of Defense Office of Local Defense Community Cooperation's Defense Spending by State Fiscal Year 2022, Revised Version (October 2023), available at: https://oldcc.gov/dsbs-fy2022 .	Comment noted. The inclusion of California Defense Spending and Economic Impacts Data is beyond the scope of SCAG's Regional Transportation Plan/Sustainable Communities Strategy. For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter FED-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001818.04.5	5. Demonstrate consistency with California's Office of Planning and Research document, California Advisory Handbook for Community and Military Compatibility Planning; 2016 Update (October 2016), available at: https://www.opr.ca.gov/docs/20190812-2016_CA_Handbook.pdf .	Comment noted. For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter FED-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir

ID	COMMENT	RESPONSE
0001818.05	Department of Defense (DoD) does not own or operate STRAHNET or other transportation routes. Therefore, the DoD depends on a strong partnership with State and local transportation agencies, planning organization, and local governments to address deficiencies to infrastructure that supports national defense. To ensure the Navy remains mission ready, we recommend continuous collaboration in long-range transportation planning; congestion management; and project programming, development, and sustainable design processes. This will help foster a common understanding of transportation needs and challenges that military activities present to the planning process.	For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter FED-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001818.06	Thank you for your time and consideration of NBVC project comments on the draft PEIR for Connect SoCal 2024 RTP/SCS. For additional coordination, please contact Mr. Kendall Lousen, NBVC Community Planning Liaison Officer, at telephone: (805) 989-0333 or via email address at kendall.p.lousen.civ@us.navy.mil .	For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter FED-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
Submitted by	Neighborhood Housing Services of the Inland Empire (NHSIE)	Submittal 0001746
0001746.01.1	- California Environmental Quality Act (CEQA) is vaguely mentioned that it challenges 1/2 of the housing production in CA through lawsuits. Would like more in depth background on their role in housing approval/creating sustainable housing and common themes behind the reasons of the lawsuits. Is it the way houses are being built, where they are being built, etc. what elements are leading to these delays.	The first paragraph of the CEQA subsection in Section 5.2.2. Building is changed to read, "As all developments in California require CEQA review, including housing units, to inform decisionmakers and the public about potential environmental effects of the proposed project in order to prevent and/or mitigate significant environmental harm, a more predictable and reliable CEQA process can facilitate more housing production. [...] The report notes that between 2010 and 2012, only 13% of CEQA lawsuits were filed by environmental organizations that existed prior to filing their CEQA lawsuit while NIMBY groups, lawyers seeking quick cash settlements, economic competitors, and labor unions comprised the remaining majority. In addition, from 2013 to 2015, higher density (e.g. apartments) on infill locations in wealthier communities were the most frequently targeted housing projects. In 2020, anti-housing CEQA lawsuits alleged failures to properly analyze and/or mitigate greenhouse gas (GHG) emissions from project activities (construction, future building occupancy and resident/guest/vendor vehicular fuel use attributed to a housing project) and vehicle miles traveled (VMT) from passenger vehicles regardless of fuel type, including electric vehicles. It was also found that CEQA lawsuits began exponentially challenging renewable energy and infrastructure resiliency in 2020 including solar, wind, hydropower, water flood, and wildfire management projects. The report noted that the reasoning behind these anti-housing CEQA lawsuits is often to preserve the status quo or to leverage CEQA lawsuits for other purposes."
0001746.01.2	- Under housing challenges, the piece touches upon great problem areas of why it's difficult to create more housing. Lack of funding availability is one of the biggest that many organizations like NHSIE can relate to. However, it's not just the lack of funding available that's a concern, but also qualifying for the funding. There's a lot of restrictions on the government funding that is available, which makes it hard for agencies who want to access the funding to service their communities. CDBG has a small strict % of what can be used for public service programs which play into preventative services that assist with cost-burdened groups of people. Most of funding is used for construction. Both constructions and public service monies are difficult to receive and expend due to strict guidelines in place.	Comment noted. SCAG continues to offer and advocate for technical assistance on grant applications to member jurisdictions. The second paragraph of subsection Lack of Funding or Complex Funding in Section 5.2.2. Building is changed to read, "The subsidies available for affordable housing development can have complex requirements and are highly competitive."
0001746.01.3	- Love the climate resilient community building and creation of 15min communities as a solution. Would like to see the economic feasibility further explained in marketing these as a solution, especially in counties like San Bernardino or Riverside that are very spread out and burdened by climate change.	Comment noted. We acknowledge that travel distances are generally longer and there are fewer historically-embedded centers in the Inland Empire—the characteristics and aesthetics of a 15-minute community will differ widely across Southern California and may require creative placemaking solutions. Plan implementation strategies, found in Chapter 3.4, outline some steps that SCAG and partners may take toward realizing more resilient communities.

ID	COMMENT	RESPONSE
0001746.01.4	<p>- Would love to see SCAG partner and support local jurisdictions as indicated throughout the element. The element provides a great overview of background and history to housing issues, problems with housing, the impacts, and potentials solutions. The side-by-side impact comparison in all the figures presented is helpful to see how the county in the region is doing collectively in certain issues/areas, but it would be nice to see concentrated section for each county since they are drastically different from each other.</p>	<p>Comment noted. SCAG staff analyzes data by County where data is available and where reasonable.</p>
0001746.02	<p>- I like how the issues of covid was a highlighted as one of the problems/barriers to housing because as stated, we are not focused on the housing supply anymore but rather the urgency of the pandemic. Coming back from the pandemic is going to look different than before in terms of creating sustainable housing in construction, tenants rights, and density/over crowding health concerns. It would be great to see a specific post Covid-19 piece from SCAG because there is much more to impact dealing with the pandemic independently.</p> <p>- It's helpful including the bills that have been passed in support of housing for the state and region as some of the solutions coming for housing over the next few years. However, will the increase in funding be accessible to all agencies or will there be strict barriers in place to access funding as with current funding? We need increasing funding for preventative services in addition to building/construction.</p>	<p>Comment noted. SCAG produces an annual report on data from the American Community Survey (1-Year Estimates) and analyzes pre- and post-pandemic trends as part of the report.</p>
0001746.03	<p>- It's helpful including the bills that have been passed in support of housing for the state and region as some of the solutions coming for housing over the next few years. However, will the increase in funding be accessible to all agencies or will there be strict barriers in place to access funding as with current funding? We need increasing funding for preventative services in addition to building/construction.</p>	<p>Obtaining funding for housing and supportive services can be challenging for stakeholders due to their complex requirements and competitive nature. Recently enacted legislature, such as SB 326 (2023) and AB 531 (2023) include measures to modernize behavioral health systems and identifies funding to increase supportive housing units.</p>
Submitted by	Ontario International Airport Authority	Submittal 0001682
0001682.01	<p>The passenger enplanement forecast for 2050 (horizon year) for ONT in the draft is incorrect. The correct forecast (prepared by Campbell-Hill Aviation for ONT in December, 2023) of total million annual passengers at ONT in 2050 is 36.2M. This is the number that should be used for all modeling of transportation requirements to ONT.</p>	<p>Comment noted. Narrative text will be edited to provide updated data/information.</p>
0001682.02	<p>In the glossary, on page 209, under LAWA or LAX – Los Angeles World Airports – Aviation authority of the City of Los Angeles.</p>	<p>Comment noted. Ontario International is removed from the LAWA or LAX definition in the Glossary.</p>
<p>Please remove ONT from the list of airports that LAWA owns and operates. ONT is owned and operated by the Ontario International Airport Authority.</p>	Submittal 0001694	
Submitted by	Ontario International Airport Authority	Submittal 0001694
0001694.01	<p>Please remove Diane Feinstein International Terminal New international terminal and federal inspection station (FIS) from the non-project list on page 72 of the Aviation and Airport Ground Access Technical Report. Please remove any reference of future new terminal facilities or FIS at ONT in Connect SoCal. While the airport is continuing to plan to meet future demand, no specific project has been identified or approved by the Board of Commissioners.</p>	<p>Comment noted. Text will be removed.</p>
Submitted by	Orange County Council of Governments	Submittal 0001766

ID	COMMENT	RESPONSE
0001766.01	<p>On behalf of the Orange County Council of Governments (OCCOG), I would like to thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (a.k.a. Connect SoCal 2024) and the associated Program Environmental Impact Report (PEIR). The draft 2024 RTP/SCS and PEIR is a monumental effort and the OCCOG recognizes that the documents are critical to the region's ability to receive federal funding for transportation projects, improve mobility, support sustainable development, operate and maintain the transportation system, and meet the region's greenhouse gas emission reduction targets and other air conformity standards.</p> <p>As we have in past RTP/SCS cycles, the OCCOG Technical Advisory Committee (OCCOG TAC) comprised of agency planning staff convened an ad hoc committee dedicated to the review of the draft 2024 RTP/SCS, PEIR and related documents. The ad hoc committee includes representation from the OCCOG; the cities of Irvine, Laguna Beach, Mission Viejo, and Santa Ana; the County of Orange; the Orange County Transportation Authority; the Transportation Corridor Agencies; the Building Industry Association; and the Center for Demographic Research (CDR) at California State University Fullerton. This committee met six times during the public comment period, and has collectively spent well over three hundred hours reviewing the draft Plan and documents, and preparing comments that incorporated additional feedback provided by Orange County jurisdictions and agencies.</p> <p>The OCCOG TAC review and analysis was discussed by the full OCCOG Technical Advisory Committee at both the December and January meetings, and at a special meeting of the OCCOG Board of Directors that took place on January 11, 2024 and serves as the basis for OCCOG's comments.</p> <p>The following general comments and recommendations are offered by OCCOG on the draft 2024 Connect SoCal Plan and PEIR and all associated technical reports. In addition to these policy-level comments, we have more detailed technical comments provided in the matrix that follows as Attachment 2. OCCOG requests that the letter and attachments be included in the public record as our collective comments on the draft 2024 Connect SoCal Plan, PEIR, and associated documents.</p>	<p>Comment noted.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001766.02	<p>1. Concurrence with the Comments from the Orange County Transportation Authority, Transportation Corridor Agencies, and Center for Demographic Research</p> <p>The OCCOG concurs with the comments identified by OCTA in its January 2024 letter. OCTA has identified policy and technical issues related to the draft 2024 RTP/SCS and PEIR that are of concern to Orange County. These are focused on the regional strategies that go above and beyond the projects submitted by the county transportation commissions (CTCs). Further, we support the technical comments presented by the Transportation Corridor Agencies and the Center for Demographic Research in their letters.</p>	<p>Comment noted.</p> <p>For responses to the Orange County Transportation Authority (OCTA) comments, please see comment IDs: 0001668, 0001733 0001760, 0001767, 0001768 0001770, 0001771.</p> <p>For responses to the Transportation corridor Agencies (TCA) comments, please see comment ID: 0001751</p> <p>For responses to Center for Demographic Research (CDR) comments, please see comment ID: 0001706</p>

ID	COMMENT	RESPONSE
0001766.03	<p data-bbox="205 94 632 115">2. Connect SoCal consistency determinations</p> <p data-bbox="205 152 1115 402">The Demographics and Growth Forecast Technical Report is currently the only document that contains language on Traffic Analysis Zone (TAZ) consistency—what has been referred to as the “TAZ disclaimer”. OCCOG is proposing updated language to clarify the limitations of the use of the growth forecast data and forecasted development pattern. OCCOG requests the updated language replace the current applicable language in the Demographics and Growth Forecast Technical Report—the only location it is currently used—and further requests the language be added to the main RTP/SCS document at the end of page 97, the Land Use & Communities Technical Report, and as a response to comments in the draft PEIR. The full text of the requested Consistency Language is included in Attachment 1 of this letter.</p> <p data-bbox="205 435 1115 516">In addition, any maps or figures that contain or depict the growth forecast data, including TAZ-level maps or development patterns, need to have the following language embedded in the map or figure.</p> <p data-bbox="205 548 1115 829">Insert data usage paragraph: “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”</p>	<p data-bbox="1136 94 2066 175">Consistency language added to Demographics and Growth Forecast Technical Report Section 5.5, Land Use and Communities Technical Report Section 7.5, and Supplementals section of Connect SoCal main book.</p>
0001766.04.1	<p data-bbox="205 894 1115 948">Recommendations: 1) Replace the Consistency Language in the Demographics and Growth Forecast Technical Report on page 45 with the language provided in Attachment 1.</p>	<p data-bbox="1136 894 2066 976">Consistency language added to Demographics and Growth Forecast Technical Report Section 5.5, Land Use and Communities Technical Report Section 7.5, and Supplementals section of Connect SoCal main book.</p>
0001766.04.2	<p data-bbox="205 992 1115 1045">2) Add the revised consistency language into the main Connect SoCal document starting on page 97.</p>	<p data-bbox="1136 992 2066 1073">Consistency language added to Demographics and Growth Forecast Technical Report Section 5.5, Land Use and Communities Technical Report Section 7.5, and Supplementals section of Connect SoCal main book.</p>
0001766.04.3	<p data-bbox="205 1089 1115 1110">3) Add the Consistency Language to the PEIR response to comments.</p>	<p data-bbox="1136 1089 2066 1203">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001766.04.4	<p data-bbox="205 1211 1115 1265">4) Add the revised consistency language into the Land Use and Communities Technical Report as Section 7.5.</p>	<p data-bbox="1136 1211 2066 1382">SCAG has added a note in Connect SoCal, as such: “Note: The development patterns shown are based on Transportation Analysis Zone (TAZ) level data. Household and employment growth projection data at the jurisdiction level or smaller geography, including TAZ, are utilized (i) to conduct required modeling analysis and (ii) to generally illustrate how regional policies and strategies may be reflected at the neighborhood level. As such these data and maps are advisory and non-binding.”</p>
0001766.04.5	<p data-bbox="205 1390 1115 1443">5) Add the data usage paragraph to all growth forecast maps and figures reporting or depicting growth forecast, development patterns, or TAZ-level data (see attached matrix).</p>	<p data-bbox="1136 1390 2066 1411">Disclaimer language added.</p>

ID	COMMENT	RESPONSE
0001766.05	<p>3. Priority Development Areas (PDAs)</p> <p>OCCOG recognizes SCAG's movement away from High Quality Transit Areas (HQTAs) that were focus areas in the 2020 RTP/SCS and the 6th RHNA cycle and now see the focus on Priority Development Areas (PDAs) in the 2024 RTP/SCS. OCCOG also recognizes the alignment of SCAG's Regional Housing Needs Assessment (RHNA) and RTP/SCS documents are required by Government Code Section 65080(b)(2)(B) and Section 65584.04(m), however, OCCOG recommends extreme caution in using and requests close consultation with local jurisdictions for any use of Priority Development Areas, such as Neighborhood Mobility Areas and Transportation Priority Areas, identified in the RTP/SCS for future purposes related to the RHNA methodology. Further OCCOG strongly advises that local jurisdictions shall not be held to these PDAs, as development patterns within a city and/or county are subject to change and such locations identified in the RTP/SCS may not be viable for future development. For any methodology to develop future RHNA allocations, jurisdictions and the Technical Working Group should be consulted.</p> <p>Recommendation: Consult with jurisdictions and the Technical Working Group on any methodology to develop future RHNA allocations or use of Priority Development Areas (PDAs) in other SCAG efforts.</p>	<p>Comment noted. Priority Development Areas (PDAs) are areas within the SCAG region where future growth can be located in order to help the region reach Plan goals. While the descriptions and data inputs of PDAs generally reflect the principles and targets of Connect SoCal, they are non-binding growth visioning tools. Additionally, they were utilized to assist in developing the preliminary growth forecasts, which were then reviewed by local jurisdictions during the Local Data Exchange which took place between May 2022 and December 2022. Feedback was accepted during this time to modify SCAG's records for priority development areas boundaries; however, following their use as a growth visioning tool, the TAZ-level household and employment growth forecast data became the sole reflection of anticipated growth in Connect SoCal.</p> <p>Additionally, SCAG recognizes and has variously stated that certain land use data-based planning tools such as HQTAs and the TAZ-level growth projections reflect a snapshot in time based on data available during a particular phase of plan development.</p> <p>SCAG's Regional Council will develop, review, and approve methodologies and all other processes related to the 7th cycle of RHNA beginning in approximately 2026 based on legislation and guidelines in effect at that time.</p>
0001766.06	<p>4. Process Concerns</p> <p>Effective Use of the Technical Working Group OCCOG appreciates the opportunity to participate in ongoing advisory groups that inform and clarify the work of SCAG staff as it relates to mandated work products, including the RTP/SCS and PEIR. Despite OCCOG's ongoing and repeated efforts, there continues to be a disconnect between SCAG's constitution of and reliance on the Technical Working Group (TWG), comprised of planning staff from SCAG member agencies and experts across the region, and how members of the group would like to be consulted and provide advisement. OCCOG strongly believes this is an underutilized resource for SCAG and that a stronger partnering and collaborative approach with the TWG would render a much-needed technical peer review for SCAG prior to public release of documents, strengthening the ultimate work products and providing a value-added opportunity for expertise to be offered to SCAG from partner agencies. One request in this vein would be to engage the TWG on updating SCAG's style guide to facilitate consistency across documents and publications and promote clarity and ease of comprehension across all levels of engagement.</p> <p>Subject Matter Working Groups In the 2020 RTP/SCS process, SCAG created a number of new issue-specific working groups with expanded memberships to reach a greater spectrum of stakeholders and continued these for the 2024 process. We applaud this proactive step to ensure that more voices are included in the preparation of the Plan. However, the proliferation of new meetings requires jurisdictions to have additional bandwidth to monitor and participate, and there has been little to no interaction from the issue-specific groups with the long-standing TWG. Coupled together this does not allow for member jurisdictions to be adequately engaged on issues across the spectrum and continues to result in silos of information.</p>	<p>Comment noted. SCAG will reassess the structure, purpose and relationships between working groups in advance of the development of Connect SoCal 2028.</p>

ID	COMMENT	RESPONSE
0001766.07	<p>Timeline Does Not Allow For Adequate Revision In addition to the structure of working groups, we emphatically recommend the timeline for development of the RTP/SCS be revised in the 2028 cycle to allow for a more robust review process prior to the holidays—or even completion of the whole process before the holidays—that would ensure that comments being provided as part of the public comment period have the opportunity to be fully considered by SCAG staff and the policy committees, and stakeholders and jurisdictions have the opportunity to ensure that comments have been addressed, prior to asking the Regional Council to adopt the final plan. This has been a long-standing concern since the 2012 RTP/SCS iteration where each Plan has been released near the holidays and the public comment period has covered holidays and closures that often make it difficult to find ample time for thorough technical review of the hundreds of pages of documents before comments are provided to governing boards for consideration to submit as official public comment. In this cycle, OCCOG has been forced to convene a special Board meeting simply to be able to offer our comments within the public comment window. Below are the dates from previous iterations that show the compressed timeline for both reviewers and SCAG’s response to comments—none of which allowed time for significant changes or updates to the documents after the public comment period.</p>	<p>Comment noted. SCAG recognizes that stakeholders have requested additional time for the draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) public review and comment period and to avoid the end of year holiday period. SCAG must balance a potential earlier release window with the risk of needing to make a larger amount of RTP project changes post-comment period which could delay Plan adoption and lead to a lapse in SCAG’s federal transportation conformity determination.</p>
0001766.08	<p>Allocate Ample Time for Robust Regional Council Discussion The RTP/SCS and PEIR are both topics that require considered debate and are likely to generate discussion among policy makers. In past iterations, discussion was cut off to accommodate some Regional Council members’ travel plans. We strongly recommend that SCAG prepare Regional Council members for a lengthy meeting that will allow for a full and robust policy discussion that does not cut off debate or comment.</p> <p>Recommendations: Use the TWG as an actual working group to provide review and counsel to SCAG staff in direct support of the work of SCAG policy committees. Have the TWG discuss and provide technical report best practice guidance regarding the style guide used for SCAG’s documents and publications. Have liaisons from each subject-matter working group participate in the TWG and ensure TWG members are included in the distribution of materials from issue-specific working groups so TWG members are aware of all ongoing issues and avoid information silos. Begin the RTP/SCS process earlier in the 2028 cycle and release drafts six months earlier to ensure that there is adequate time after the initial draft is released to SCAG to fully respond to and incorporate comments, especially as relates to the need for data corrections. Inform Regional Council members ahead of time that the agenda is lengthy and prepare them to allocate additional time should discussion exceed the normally-allotted two hours for a meeting.</p>	<p>Comment noted. In June 2022, SCAG’s Regional Council adopted a Connect SoCal 2024 Policy Development Framework to guide Plan development. This included the creation of three special subcommittees to dive deeper into key issue areas for Connect SoCal and allow space and time for more robust discussion among policy makers. From 2021-2024, SCAG’s Regional Council and Policy Committees have received over 100 staff reports on various aspects of Connect SoCal 2024 development including process updates, analysis and modal updates.</p> <p>Following the adoption of Connect SoCal 2024, SCAG will reassess the purpose and relationships of its working groups, including the Technical Working Group.</p>

ID	COMMENT	RESPONSE
0001766.09	<p>5. Growth Forecast</p> <p>OCCOG greatly appreciates the close coordination between SCAG and CDR on behalf of Orange County jurisdictions to ensure the 2024 RTP/SCS growth forecast accurately reflects development agreements; entitlements; current construction and recent construction; open space; and general plan densities.</p> <p>OCCOG opposes any alternative in the PEIR that does not utilize local input provided through the local input/Local Data Exchange (LDX) process. Any alternative that does not properly reflect all development agreements, open space protections, and recent or ongoing construction submitted by jurisdictions should not be utilized as the preferred alternative.</p> <p>We also want to restate our appreciation for the LDX process during this iteration whereby SCAG folded in the growth visioning and policies into the initial draft growth forecast that was provided to local jurisdictions for review during the LDX process. OCCOG has staunchly advocated for this approach since the 2012 RTP/SCS development process. The inclusion of the local jurisdiction input submitted on housing and employment directly into the RTP/SCS—and unchanged—demonstrates the successful collaborative visioning along with accurately reflecting entitlements and local policies and plans. We urge SCAG to continue this same process in future iterations.</p>	<p>Comment noted.</p>
0001766.10	<p>6. Remain Neutral on Technology</p> <p>Throughout the documents, there are specific examples of technology identified. It is not SCAG's purview to pick winners and losers in technology; the marketplace will determine dominant technologies. Therefore, it should be noted that these are only examples and that future technologies should not be ignored or excluded from meeting the goals of the RTP/SCS. This will allow the document, including mitigation measures, to be more inclusive of and responsive to changing technological advances.</p> <p>Recommendation: The RTP/SCS and PEIR documents should emphasize SCAG's desire to facilitate and support innovation, but avoid naming specific technologies or providers (example "TNCs" not "Uber and Lyft" or "zero emissions" instead of "electrification").</p>	<p>Comment Noted. Connect SoCal 2024 was crafted in accordance with SCAG's Clean Transportation Technology Policy, as outlined in Resolution No.23-654-5, adopted by the Regional Council. This resolution establishes a framework for assessing zero or near-zero emission transportation systems, emphasizing technology neutrality. The policy is referenced in Chapter 2: Our Region Today, specifically on Page 63. There may be instances where reference to specific technologies such as electric vehicles are necessary for the particular context, including when describing a specific program or strategy.</p> <p>Moreover, SCAG has compiled a Clean Technology Compendium. This resource offers staff and decision-makers a selection of feasible clean technologies for potential implementation within their local jurisdictions. The Compendium is referenced also in Chapter 2: Our Region Today, page 63, and served as a foundational document for data collections, analysis and research.</p> <p>SCAG does utilize the term TNC, which is defined in the Glossary. As this term may not be relatable to the reader who doesn't use the term in their day-to-day lives, SCAG references Uber or Lyft as recognizable examples of TNCs.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001766.11	<p>7. Maintain Unbiased, Objective Tone</p> <p>Language throughout the draft Connect SoCal Plan and PEIR and the associated technical reports and appendices has a tendency to be leading and dramatic in its emphasis of certain key issues, such as housing, equity, and land use policy. While these issues are important, using opinion-based and emotionally charged language is inappropriate in this context.</p> <p>Recommendation: SCAG should remove, wherever applicable, opinion and descriptive language that does not reflect the fact-based, data-driven nature of this critical document in favor of a more unbiased, objective tone that embraces the diversity of the region. Examples of overly emphatic language are outlined in Attachment 1.</p>	<p>Comment noted. SCAG's use of first-person tone was in some cases used to make the material more readable to a general public audience reader. Text is updated where feasible to reduce the use of language like "our" to present a more objective tone.</p>

ID	COMMENT	RESPONSE
0001766.12	<p data-bbox="205 94 401 118">8. "Can and Should"</p> <p data-bbox="205 152 1123 544">As indicated in the PEIR, state law provides that it is appropriate to indicate in mitigation measures that they "can and should" be implemented where the authority to implement the measures rest with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies' regulatory measures. OCCOG recognizes SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems any language seemingly imposing affirmative obligations contrary to SB 375 inappropriate. As such, the use of the language "can and should" for mitigation measures addressed to local agencies is overreaching. SCAG should therefore add the following qualifier subsequent to each use of "can and should": "where applicable and feasible".</p> <p data-bbox="205 574 1123 657">Recommendation: Ensure consistent language in each project-level mitigation measure by adding "where applicable and feasible." This change will clarify that the project-level mitigation measures are a menu of options.</p>	<p data-bbox="1136 94 2060 207">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001766.13	<p data-bbox="205 670 520 695">Duplicative/Existing Regulations</p> <p data-bbox="205 729 1123 1177">It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g., CEQA review requirements). Under CEQA, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact, and the significance of the impact should be looked at after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If SCAG opts not to remove mitigation measures that restate existing regulation, then OCCOG requests that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken.</p> <p data-bbox="205 1208 1123 1287">Recommendation: OCCOG proposes the use of: "Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations," and acknowledges SCAG has already included similar language in some mitigation measures.</p>	<p data-bbox="1136 670 2060 784">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001766.14	<p>Provide Sources for All Graphics and Tables</p> <p>When a report of such complexity as the Connect SoCal Plan is produced, it is common for tables, maps, and other graphics to be used or referred to in a manner that could divorce them from the context in which they are presented. For instance, someone may come upon a chart that explains a topic they are researching and could download the image separate and apart from the technical explanation accompanying it in the electronic version of the document. Without original source information embedded in the graphic, information can be spread without proper attribution. We understand that it may “look cleaner” to not include a source, date, and citation for data but best practices for technical reports include adding sources to all graphics. In addition, citing another SCAG report as the source instead of the original data source should be avoided.</p> <p>Recommendation: Make it a SCAG style guide policy to include the original source and date of all data used in tables, charts, maps, infographics etc. included in all Connect SoCal- related documents. All related documents should also be branded with “Connect SoCal 2024” to differentiate from past and future iterations.</p>	<p>Comment noted. Maps, tables and other elements have been updated, where feasible, to reference Connect SoCal 2024 and include original data source(s).</p>
0001766.15	<p>The OCCOG recognizes the immense efforts SCAG undertook to prepare the Connect SoCal 2024 RTP/SCS and PEIR documents. The Plan is the culmination of a multi-year effort focused on incredibly complex technical work and has important and far-reaching policy impacts for our region. It is precisely because of this importance and complexity that we reiterate our concern about the timing of the release of the documents. Our desire is that the preparation of RTP/SCS documents in future cycles will take into account the need to accommodate adequate review, discussion, and revision time for all of the documents. The timeline adopted in the past three cycles makes it challenging to have credible discussion regarding possible changes, because the timeline does not allow for recirculation or full discussion of requested changes. While OCCOG is appreciative of the opportunity to provide public comment, there remains concern that only a few weeks remain for SCAG to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS by the April 2024 deadline. With that, we look forward to working with SCAG collaboratively to achieve the schedule.</p> <p>We appreciate your consideration of all the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have an RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do not hesitate to contact me or Marnie Primmer, OCCOG Executive Director at (949) 698- 2856 or marnie@occog.com.</p>	<p>Comment noted.</p>
Submitted by	Orange County Council of Governments	Submittal 0001777
0001777.001	<p>Table 1: 2024 RTP/Connect SoCal Comments & General Comments</p> <p>#1 General Comment, All documents Include “2024” in all headers for proper citation/reference since the last plan was also called “Connect SoCal”.</p>	<p>Technical report page headers’ titles have been updated to include “2024”.</p>
0001777.002	<p>#2 General Comment, All documents In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data</p>	<p>Sources have been updated to reference the original data source, where applicable.</p>

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0001777.003	#3 General Comment, All documents Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.	Comment noted. The text has been updated to capitalize "Plan" where applicable.
0001777.004	#4 General Comment, All documents For data that is not derived from Connect SoCal models, cite source.	Sources have been updated to reference the original data source, where applicable.
0001777.005	#5 General Comment, All documents If definitions come from specific source or statute, include the reference in the narrative and the glossary.	Comment noted. References to specific sources or statutes for a given definition have been updated, where feasible.
0001777.006	#6 General Comment, All Technical Reports Add "Technical Report" and "2024" to all technical report page headers' titles	Technical report page headers' titles have been updated to include "2024".
0001777.007	#7 General Comment, All documents Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion	Comment noted.
0001777.008	#8 General Comment, All documents Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, otherwise known as "Spheres of Influence" the growth must be feasible.	Comment noted.
0001777.009	#9 General Comment, All documents Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.	Where applicable, SCAG has added text to tables and graphics to reflect where numbers may not sum due to rounding.
0001777.010	#10 General Comment, All maps and figures with growth forecast data, TAZ data, or forecasted development pattern Add: language to map and/or map page "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."	Disclaimer language added to maps.
0001777.011	#11 General Comment, All documents Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years. Add notes to language and table or figures that indicate "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."	Additional references on underlying land use classifications within existing farming areas has been added to Section 3.2 in the Land Use and Communities Technical Report.
	Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.	

ID	COMMENT	RESPONSE
0001777.012	#12 Correction, All pages All documents e.g., 45, 50, 59, 60, 96 References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”	This correction is applied.
0001777.013	#13 General Comment, All documents “state of California” should be “State of California” “county/counties of xxx” should be “County of xxx”	Comment noted. The suggested edit conforms neither to the AP Stylebook nor the Chicago Manual of Style, which are the main guides used for SCAG’s documents.
0001777.014	#14 Glossary Add to glossary: 15-minute communities ACS AFFH ASMSA AT AVTA BTU BUILD CAL ITP CALFIRE CAV CCED CCSO communities of color CPAD CPI CTC DOT EEC FEMA FHSZ FLMA FMMP GDP historically marginalized HQTACs HSD ICT Indigenous populations INFRA LC LMFDS LMFP MBPS MIP NHHW NHS OCFC PACT Protected populations p.188 Priority communities p.188 PTS	Comment noted. The glossary is updated to include terms and acronyms used in the main Connect SoCal 2024 document. In cases when an acronym listed here was used only once in the document, the text is updated to remove the acronym entirely.

PUMS
RFM1
RIF
RRIF
RTPAS
SAFETEA-LU
SCM1
SCORE
SCP
SCRRRA
SMAQ
SOAR
SOT
SPM
SSO
TCA
TEZ
TIF
TMO
TMP
TWMO
UBM
WHAR12
ZETI

0001777.015	<p>#15 Revision, p. 9, second paragraph under "Mobility" Revise the last sentence and insert the word "safety." For example: "However, more work is needed to be better manage both the viability, safety, and reliability..." [See Table 1 in attached letter for denoted edits]</p>	<p>SCAG is revising the text to read: "However, more work is needed to better manage both the viability, reliability, and safety of the transportation system and consumer demand for it." For reference, the original text reads: "However, more work is needed to better manage both the viability and reliability of the transportation system and consumer demand for it."</p>
0001777.016	<p>#16 Correction, p. 10 RH column. SB 375 was passed in 2008, please delete reference to this as recently passed. "..With the [strikeout] more recent [end strikeout] passage of SB 375." [See Table 1 in attached letter for denoted edits]</p>	<p>The text is updated.</p>
0001777.017	<p>#17 Clarification, p. 10; column 1; paragraph 1; last sentence "SCAG will collaborate with federal, state and local partners to ensure that the implementation of the Plan helps address existing air-quality challenges, [strikeout] preserve [end strikeout] [insert] most reasonably utilize [end insert] natural lands and reduce GHG emissions." [See Table 1 in attached letter for denoted edits]</p>	<p>Comment noted. Natural and Agricultural Land Preservation is key environmental category for Connect SoCal 2024 Regional Planning Policies and Implementation Strategies. See Chapter 3 for more details.</p>
0001777.018	<p>#18 Comment, p. 12, first bullet point under "Focusing on Objectives" Explain how SCAG aims to make transit the backbone of the transportation system? It seems to contradict the current state of our transit system – low ridership and public safety concerns.</p>	<p>Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas. The Mobility Technical Report details the strategies (e.g., dedicated bus lanes, mobility hubs, etc.) that support growth towards this vision.</p>
0001777.019	<p>#19 Clarification, p. 12; column 2; paragraph 1; sentence 1 "By 2050, the population of the region is projected [insert] in the Plan [end insert] to increase by two million people, or 11 percent, with an increase of 1.6 million housing units, or 26 percent, and 1.3 million jobs, or 14.2 percent." [See Table 1 in attached letter for denoted edits]</p>	<p>The text is updated.</p>

ID	COMMENT	RESPONSE
0001777.020	<p>#20 Clarification, P. 12, column 2; paragraph 3</p> <p>"[insert]This plan projects that s[end insert][strikeout]S[end strikeout]ixty-seven percent of new households and 55 percent of new jobs between 2019–2050 will be located in Priority Development Areas, either near transit or in walkable communities."</p> <p>[See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.021	<p>#21 Clarification, P. 13, column 2; paragraph 1; last sentence</p> <p>"Within those elements, the Plan also strives to achieve broader regional objectives, such as increased housing production, improved equity and resilience, the [strikeout]preservation[end strikeout] [insert]most reasonable utilization[end insert] of natural lands, improvement of public health, increased transportation safety, support for the region's vital goods movement industries and more efficient use of resources."</p> <p>[See Table 1 in attached letter for denoted edits]</p>	Comment noted. Natural and Agricultural Land Preservation is key environmental category for Connect SoCal 2024 Regional Planning Policies and Implementation Strategies. See Chapter 3 for more details.
0001777.022	<p>#22 Clarification, p. 14 & 78</p> <p>SCAG stated that it is not in charge of implementation, but the graphic and its presentation seems to imply that SCAG is a part of implementation. Make SCAG's role more clear in that it is not in charge of implementation.</p>	Comment noted. The graphic is updated.
0001777.023	<p>#23 General comment, p. 26</p> <p>This Plan includes strategies that were in 2020; therefore, not new ideas. Should Section 2 include a summary of how the last RTP/SCS performed. "Since approval of the 2020 RTP/SCS the region has made great progress in these areas..."</p> <p>What was the performance of the 2020 RTP? A summary of the 2020 RTP/SCS Progress provided on pages 178-179 should be summarized at the beginning of Chapter 2. Where are we at and what needs to be done? There was no initial summary at the beginning of the report, which would have been helpful.</p>	A Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is a long-range planning document. The "Taking Action" section of Chapter 2 includes a highlight of SCAG actions since 2020 and regional Connect SoCal 2020 implementation. The Connect SoCal Performance Profile and Performance Results on pages 178-179 of the draft Connect SoCal 2024 refer to the 2050 horizon year performance and not the progress since Connect SoCal 2020 was adopted. The "On-Going Performance Monitoring" section of the Performance Monitoring Technical Report provides additional information on observed regional progress in each Connect SoCal 2024 goal area.
0001777.024	<p>#24 Clarification, p. 29; paragraph 3</p> <p>last sentence</p> <p>"The history of [insert]some[end insert] transportation and housing policies in both the United States and California demonstrates how racism in government..."</p> <p>"This data shows that 18.4 percent of fatal collisions in 2021 involved [insert]non-Hispanic[end insert] Black victims, who represent just over 6 percent of the population."</p> <ul style="list-style-type: none"> • Is this 18.4% of walking and biking fatalities or all transportation fatalities? • Cite data source for fatalities <p>[See Table 1 in attached letter for denoted edits]</p>	References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context.
0001777.025	<p>#25 Clarification, p. 31, column 1, paragraph 1</p> <p>"The COVID-19 pandemic [insert]and the response to it[end insert] impacted the way we live, work and play in the region—and we are still feeling those impacts today. When SCAG's Regional Council adopted Connect SoCal 2020 for all purposes in September 2020..."</p> <ul style="list-style-type: none"> • Clarify what "for all purposes" was Connect SoCal adopted. <p>[See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.026	<p>#26 Clarification, p. 31, column 1, paragraph 3; sentence 2</p> <p>"The pandemic [insert] response[end insert] provided additional shocks – a near-zero level of foreign immigration, fewer births and excess deaths from the pandemic itself."</p> <p>[See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.027	<p>#27 Clarification, p. 34, column 2, paragraph 2; last sentence</p> <p>"These Guiding Principles should be considered as a starting point and [insert]may be[end insert] used as building blocks that agencies and local jurisdictions can adapt to fit their unique needs when making informed decisions regarding emerging technology."</p> <ul style="list-style-type: none"> • Are agencies required to use these or adapt them for use? <p>[See Table 1 in attached letter for denoted edits]</p>	Comment noted. The report states these principles "should be considered" but does not require any agency to do so.

ID	COMMENT	RESPONSE
0001777.028	#28 Source, p. 35 Second paragraph under Climate Change, what is the source of the information provided.	The source for information related to climate change impacts cited in Chapter 2 has been added.
0001777.029	#29 Clarification, p. 38, column 1, paragraph 1; sentence 2 "We are home to an ... 109 miles local light rail, serving 108 stations, Amtrak intercity and long-distance services; ..." • Clarify 109 phrase	SCAG is revising the text to read: "The region is home to an extensive transit/rail network that includes over 100 transit operators; 33,485 miles of bus routes, including local bus, express and bus rapid transit (BRT); 109 miles of local heavy and light rail, serving 108 stations; Amtrak intercity and long-distance services; and Metrolink commuter rail service, which operates on seven lines with 66 stations in five of six counties on a 546 route-mile network." For reference, the original text reads: "We are home to an extensive transit/rail network that includes over 100 transit operators; 33,485 miles of bus routes, including local bus, express and bus rapid transit (BRT); 109 miles local light rail, serving 108 stations; Amtrak intercity and long-distance services; and Metrolink commuter rail service, which operates on seven lines with 66 stations in five of six counties on a 546 route-mile network."
0001777.030	#30 Clarification, p. 38, column 2 Add final statement: "Maps contained in Connect SoCal are for general reference and provide snapshots of the region. Please contact the appropriate agency for the most recent information."	Comment noted. Chapter 2 is updated to both introduce the maps included in this chapter and clarify their purpose and use.
0001777.031	#31 Clarification, p. 39, map 2.1 • Change "City boundary" in legend to date of city boundary, e.g., "January 1, 2023 City boundaries" • Freeway and highways are difficult to tell apart; change symbology. • Relabel Freeways to Freeways/Toll Roads • Add Year to title • Define bottlenecks or add note referring reader to Technical Report if information is included in another Connect SoCal document.	At the request of SBCTA, Map 2.1 was replaced with a Goods Movement bottlenecks map. The updates requested for Map 2.1 have been applied to the Congestion Management Technical Report's Map #1 as noted below: - The symbology for the highway layer is changed to enhance the visual distinction between the highway and freeway layers. - The year "2019" is added to the map title since the dataset being used for this map is Caltrans Performance Measurement System (PeMS) data from 2019. Note the following changes are not made to Map #1: - Changes to the legend to include the date of the city boundary would necessitate updating it across all layers. As SCAG utilizes the most up-to-date data available and considering there's no specific reason to note the changes in the legend, the current legend format is maintained. - The freeway layer and highway layer remain separate layers in the map legend. SCAG is adding a definition of "Freeway" in the Glossary session of the Report, which describes Interstate Highway and Toll Roads included in the freeway data layer. The Congestion Management Technical Report defines bottlenecks: "According to the US Department of Transportation, a bottleneck is a localized constriction of traffic flow." For more on the definition, please refer to page 19 of the technical report.
0001777.032	#32 Clarification, p. 40, map 2.2 • Why is map labeled 2019/2022? • Label each layer's year as applicable or add source notes. • Add definitions of rapid bus and bus rapid transit or add note referring reader to where the definitions are.	SCAG is revising the map title to read: "Map 2.2 Existing Transit Network (2019)." The map is based on 2019 model network data. For reference, the original text reads: "Map 2.2 Existing Transit Network (2019/2022)." Bus Rapid Transit is defined within the Main Book's glossary.

ID	COMMENT	RESPONSE
0001777.033	<p>#33 Clarification, p. 41, map 2.3</p> <ul style="list-style-type: none"> • Add year to title • Change “City boundary” in legend to date of city boundary, e.g., “January 1, 2023 City boundaries” • Freeway and class 1 bike lanes are difficult to tell apart; change symbology. • Add definitions for lane classifications or refer readers to locations. • Clarify the two sets of bike lanes • Relabel Freeways to Freeways/Toll Roads 	SCAG is updating the map to improve clarity.
0001777.034	<p>#34 Clarification, p. 42, map 2.4</p> <ul style="list-style-type: none"> • What data year is map displaying? • Change “City boundary” in legend to date of city boundary, e.g., “January 1, 2023 City boundaries” • Freeway and arterials are difficult to tell apart; change symbology. • Relabel Freeways to Freeways/Toll Roads 	SCAG is updating the map to improve clarity.
0001777.035	<p>#35 Clarification, p. 45, paragraph 1; sentence 2</p> <p>“[insert]Responses to [end insert] the COVID-19 pandemic sparked changes in travel behavior and trends, which spotlight what is needed and what is possible for the future of transportation in our region.”</p> <p>[See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.036	<p>#36 Clarification, p. 47, column 2; paragraph 2</p> <p>“The patterns that characterize our communities largely come down to housing and households. Over half of the region’s 6.6 million housing units were built before 1980. [insert]For the purposes of Connect SoCal, the category of “multi-family” residential units includes townhomes, which are defined by the State of California Department of Finance and the U.S. Census Bureau as single-family homes. The category Connect SoCal refers to as ‘multi-family’ units that are attached residences, including apartments, condominiums and townhouses.[end insert] While 54 percent are single-family homes, 46 percent are multifamily homes such as condominiums, townhouses and apartments...”</p> <p>[See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.037	<p>#37 Clarification, p. 47, column 2; paragraph 2; sentence 4</p> <p>“The predominant form of new housing construction has fluctuated over time—a function of the number of people entering their 20s and 30s (the main household formation years) and other aspects of the housing market[insert], including limited land availability in some parts of the region.[end insert]”</p> <p>[See Table 1 in attached letter for denoted edits]</p>	Added note about land availability.
0001777.038	<p>#38 Clarification, p. 48, Figure 2.1</p> <p>Is this the number of permits issued or number of units permitted? DOF doesn’t report the number of permits in E-5 file.</p>	Source has been corrected.
0001777.039	<p>#39 Revision/Deletion, p. 49</p> <p>Remove and/or revise the exhibit on this page. It appears that the region is building housing beyond the population growth needs.</p>	An error in this exhibit’s legend which may contribute to such a misunderstanding has been corrected.

ID	COMMENT	RESPONSE
0001777.040	<p>#40 Clarification, p. 49, column 1; paragraph 1; sentence 2 "...In a high-cost urban megaregion with decreasing family sizes, the single-family-heavy skew of the current housing stock puts homeownership more out of reach for low- and moderate-income households, while also increasing overcrowding rates and travel distances." • Doesn't more single-family units increase the number of options for buyers, which result in a benefit through the ability to build equity?</p>	<p>Since housing type is not necessarily associated with rental or for-sale status, this sentence was clarified and re-centered around the amount of land consumption associated with single-family housing.</p>
0001777.041	<p>#41 Clarification, p. 49, column 2 figure • What was pattern of building 1950-1980? Did we overbuild, underbuild or right-size build? • 2000-2020 "green" housing figures- does this imply we overbuilt in 2000-2020 period? • Is assumption of 3.0 pphh appropriate?</p>	<p>Generally a longer time horizon of comparison introduces additional complications such as data availability and differences in home and family sizes. 2022 American Community Survey 1-year Estimates show that 43.2% of today's housing stock was built between 1950 and 1979, suggesting that even accounting for some demolitions and turnover this was a period of high home construction.</p> <p>The green highlight in the graphic indicates that housing construction exceeded the need based solely on population growth over the same period of time.</p> <p>For the purposes of this illustration, an assumption of 3.0 persons per household (pphh) is a reasonable assumption as it is roughly equivalent to the average household size in the SCAG region since at least 2000. There are many factors to consider beyond the scope of this infographic when assessing housing demand based on population change, specifically the age structure of the population; more detail can be found in the Demographics and Growth Forecast Technical Report.</p>
0001777.042	<p>#42 Clarification, p. 51, map 2.5 • Add to title "(Jobs per ___square mile? ___)" • Relabel Freeways to Freeways/Toll Roads</p>	<p>Comment noted. Title updated to "2019 TAZ Employment Density (Jobs per Square Mile)". Freeway layer/legend updated.</p>
0001777.043	<p>#43 Clarification, p. 52, map 2.6 • Add to title "(per ___square mile? ___)" • Relabel Freeways to Freeways/Toll Roads</p>	<p>Comment noted. Title updated to "2019 TAZ Household Density (Households per Square Mile)". Freeway layer/legend updated.</p>
0001777.044	<p>#44 Clarification, p. 53, map 2.7 • Add data year to title • Add link to where land use definitions are • Explain if these are the consolidated land use categories and not the original jurisdiction maps</p>	<p>Comment noted. Title updated to "2019 Existing Land Use (SCAG Land Use Codes)". The SCAG Land Use Code definitions will be included as an appendix to the Land Use and Communities Technical Report. The Source of the map now reads: "SCAG 2023. Please note that existing land use data shown in the map represents an approximation of local conditions as of 2019. SCAG shall not be responsible for user's misuse or misrepresentation of this map. For authoritative data on these subjects, please contact the respective local jurisdiction directly. For more information on SCAG's Land Use Codes, please visit the appendix of the Land Use and Communities Technical Report."</p>
0001777.045	<p>#45 Clarification, p. 54, column 1; sentence 3 "...Years of underbuilding has resulted in a shortfall in the number of units needed to house the region comfortably and created issues such as cost burden and overcrowding." • Define cost burden & include reference source/as defined by... • Define overcrowding & include reference source/as defined by...</p>	<p>Comment noted. As indicated in the subtext, please refer to the housing technical report for definitions. The cost burden definition is found page 12, Section 4.4 and the overcrowding definition is found on page 16, Section 4.5.</p>

ID	COMMENT	RESPONSE
0001777.046	#46 Clarification, p. 54, column 2; paragraph 2 sentence 1 "The quantitative impacts of the housing crisis, such as overcrowding, cost burden and [insert]low [end insert] home ownership, disproportionately burden communities of color." [See Table 1 in attached letter for denoted edits]	The third paragraph in the Current Conditions subsection on page 54 is changed to read, "The quantitative impacts of the housing crisis, such as overcrowding, cost burden, and low home ownership, disproportionately burden communities of color."
0001777.047	#47 Clarification, p. 54, column 1; paragraph 1 sentence 5 "Households that spend more than 30 percent of their income on housing are considered [insert]cost-burdened[end insert] [strikeout]"overpaying"[end strikeout] and will have less income to spend on both essential needs, such as food and transportation, and discretionary purchases." • "overpaying" is not the same as "cost-burdened"- overpaying is associated with the cost of the rent, not the share of income being paid on rent	The first paragraph in the Key Community Challenges subsection is changed to read, "Households that spend more than 30 percent of their income on housing are considered cost-burdened and will have less income to spend on both essential needs, such as food and transportation, and discretionary purchases."
0001777.048	#48 Clarification, p. 54, column 2; paragraph 1 sentence 1 "A recent comprehensive study on the California homelessness crisis found that the majority (89 percent) of unhoused persons lived in California prior to becoming unhoused, and the primary factors leading to homelessness were economic or social." • List or define the "social" factors.	The third paragraph under the section Key Community Challenges is changed to read "A recent comprehensive study on the California homelessness crisis found that the majority (89 percent) of unhoused persons lived in California prior to becoming unhoused. The top three economic reasons include lost or reduced income, housing costs were too high, or person was stolen from or was the victim of a scam while the top three social reasons include conflict among residents, person didn't want to impose/wanted own space, and conflict with property owner."
0001777.049	#49 Clarification, p. 54, column 2; paragraph 1 sentence 1 "Out-migration: While the region typically loses more residents to other states and counties than it gains, domestic out-migration increased notably early in the [insert]COVID-19[end insert] pandemic. While slow or negative growth can reduce projected housing need, domestic out-migration reflects [insert]several factors, including[end insert] the inability or lack of desire of Southern Californians to stay in the communities they call home. [insert]Out-migration[end insert] [strikeout]It[end strike] is one economic response to a too-small housing supply, alongside overcrowding, cost burden, becoming unhoused, and the suppression of life-cycle ambitions (e.g., household formation and homeownership)." [See Table 1 in attached letter for denoted edits]	Edit made to this paragraph to reflect comment.
0001777.050	#50 Clarification, p. 56, column 1; paragraph 1 sentence 2 "...[insert]Poor l[end insert][strikeout]l[endstrike]ocal air quality and the lack of dependable transportation options, active transportation, affordable housing, health care and job opportunities in many SCAG region communities can lead to poor health outcomes." [See Table 1 in attached letter for denoted edits]	The text is updated.
0001777.051	#51 Clarification, p. 56, column 1; paragraph 2; sentence 1 "Natural lands [insert](see glossary for definition)[end insert] offer important benefits to the region, including capturing carbon emissions and recharging groundwater resources. However, natural lands have decreased by roughly 50,000 acres, or 0.2 percent, between 2012 and 2019. Farmland decreased by 40,000 acres, or 3.5 percent, between 2012 and 2018. While farming practices can contribute to GHG emissions, these are typically far less than emissions in urban environments, and farm and grazing lands can provide" [See Table 1 in attached letter for denoted edits]	Comment noted. Natural lands is defined in the Glossary for Connect SoCal.
0001777.052	#52 Clarification, p. 56, column 2; paragraph 3 sentence 4 These conditions are known as the Social Determinants of Health (SDOH), and they help explain why [insert]some[end insert] health outcomes (e.g., rates of asthma or diabetes) vary widely across the region." [See Table 1 in attached letter for denoted edits]	The text is updated.
0001777.053	#53 Clarification, p. 56, column 2; paragraph 4 sentence 1 "The urbanization of the region over the past several decades has led to the consumption of hundreds of thousands of acres of natural land and farmland [insert]to house and serve those residents[end insert]." [See Table 1 in attached letter for denoted edits]	Comment noted. While it may be generally assumed that the consumed natural and farmland over the past several decades has been to the benefit of housing and serving residents in the region, SCAG has not analyzed this conclusion.

ID	COMMENT	RESPONSE
0001777.054	<p>#54 Clarification, p. 58, column 2; paragraph 1 last sentence “Communities in the SCAG region that depend primarily on wage income are missing out on the economic prosperity suggested by the growth in GDP [insert] by....[end insert]” • How are they missing out? [See Table 1 in attached letter for denoted edits]</p>	Comment noted. Wording updated in Chapter 2.
0001777.055	<p>#55 Clarification, p. 59, Figure 2.3 Change title to “GDP Per Capita and Wage Income, 2010-2021”; current title is commentary.</p>	The figure title is updated as suggested.
0001777.056	<p>#56 Clarification, p. 59, column 1, sentence 2 “[insert]Though the[end insert] [strikeout]The[end strike] region’s [strikeout]well-diversified[end strike] economic base [insert]is well-diversified, it[end insert] may not benefit all people in the region equally.” [See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.057	<p>#57 Clarification, p. 61, map 2.8 Add data year to title</p>	Comment noted. The year of the data is included in the source information.
0001777.058	<p>#58 Clarification, p. 62, column 1, paragraph 1, last sentence “This will likely put additional strain on [insert]social, safety-net programs[end insert] [strikeout]retirement funding[end strike], including Social Security.” [See Table 1 in attached letter for denoted edits]</p>	The text is updated to refer to Social Security as a retirement benefit, in alignment with the terminology used by the U.S. Social Security Administration.
0001777.059	<p>#59 Clarification, p. 64, column 2, paragraph 1, last sentence “The program aims to build street-level community resiliency and increase the safety of people most harmed by traffic injuries and fatalities, prioritizing [insert]non-Hispanic[end insert] Black, Indigenous and [insert]other[end insert] people of color;...” [See Table 1 in attached letter for denoted edits]</p>	Comment noted. This text is not referring to specific data. Typically, the distinction of ethnicity of a certain race is given in the context of describing data from a survey that collects data on race and ethnicity using two separate questions. Sections 2.3 and 4.3.1 of the Equity Analysis Technical Report includes more discussion on language around race and ethnicity.
0001777.060	<p>#60 Clarification, p. 64, column 2, paragraph 2, last sentence “Sustainable Communities Program: SCAG helps to advance Connect SoCal through the Sustainable Communities Program [insert](SCP)[end insert], which has facilitated over \$16.9 million in funding to local jurisdictions since...” [See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.061	<p>#61 Clarification, p. 65, column 1, paragraph 1 “Since Connect SoCal was adopted in 2020, transportation agencies and local jurisdictions have taken actions [strikeout]to[end strike] [insert]that[end insert] implement the Plan.” • Actions may or may not be specific to implementing Plan [See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.062	<p>#62 Clarification, p. 65, column 1, paragraph 2, sentence 2 “In March 2021, SCAG adopted its 6th cycle Regional Housing Needs Assessment (RHNA)—based on Connect SoCal [insert]2020[end insert]’s growth vision— by allocating units to cities and counties with the greatest job and ...” [See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.063	<p>#63 Clarification, p. 65, p. 65, column 1, paragraph 2, last sentence “These actions represent the first time the state provided funding to regions to conduct the RHNA program and support regional housing-planning efforts.” • REAP funds were used for SCAG to do RHNA?</p>	Comment noted. Per its HCD-approved REAP application, SCAG used some of its REAP funds for the development of the 6th cycle RHNA methodology.

ID	COMMENT	RESPONSE
0001777.064	<p>#64 Clarification, p. 65, column 2, paragraph 1, sentence 3 & page 67, column 2 callout text in green</p> <p>“Since Connect SoCal was adopted in 2020, SCAG has gained new responsibility for the selection of transportation projects to be funded with federal revenue sources[insert], such as CMAQs, STBG, and CRP[end insert]. SCAG’s project selection process follows a performance-based evaluation and selection approach—and ensures that selected projects further Connect SoCal goals.”</p> <ul style="list-style-type: none"> • SCAG has the power to provide funding for transportation projects? Please provide examples [See Table 1 in attached letter for denoted edits] 	The text is updated.
0001777.065	<p>#65 Clarification, p. 68, column 3, paragraph 1, sentence 2</p> <p>“Because the elements of the PACT were developed jointly, residents were uniquely empowered to cohesively develop their vision for active mobility and recreation in Riverside manner and then codify it through the Complete Streets Ordinance.”</p> <ul style="list-style-type: none"> • “...in Riverside manner” sentence is incomplete 	The text is updated.
0001777.066	<p>#66 Correction, p. 69, column 1, paragraph 1, sentence 2</p> <p>“The grant application consists of ... [strikeout]at twenty-four[end strike] at 24 intersection locations.”</p> <p>[See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.067	<p>#67 Clarification, p. 77, column 2, paragraph 3</p> <p>“SCAG develops a forecasted development pattern that details where future jobs and housing [insert]are projected to[end insert] [strikeout]will[end strike] be located, based on expert projection, existing planning documents, regional policies[insert],[end insert] and review and [insert]input[end insert] by local jurisdictions.”</p> <p>[See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.068	<p>#68 Clarification, p. 78</p> <p>“Implementation: Jurisdictions take action at the local level [insert]that may[end insert] [strikeout]to implement work that[end strike] move[strikeout][s][end strike] toward achieving this regional vision.”</p> <p>[See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.069	<p>#69 Clarification, p. 79, column 1, paragraph 2, sentence 1</p> <p>“Consistency and consultation: During the development of the Plan, SCAG reviewed thousands of planning documents. These documents were developed [insert]in part[end insert] by cities, counties and transportation agencies to [insert]review[end insert][strikeout]promote[end strike] consistency between local plans, the Regional Transportation Plan, and federal and state documents like the California Transportation Plan.”</p> <p>[See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.070	<p>#70 Clarification, p. 79, column 2, paragraph 1, sentence 2</p> <p>“SCAG partnered with 16 community-based organizations, attended 20 pop-up events and collected over 3,600 survey responses.”</p> <ul style="list-style-type: none"> • Please clarify if this is the number of respondents or number of questions answered by respondent providing answer. It is misleading if the answer is the latter and should be clarified. 	Comment noted. The text is updated to clarify that the “3,600 survey responses” refers to the total of survey forms submitted by respondents.

ID	COMMENT	RESPONSE
0001777.071	<p>#71 Clarification, p. 80, column 1, paragraph 2, sentence 4</p> <p>"Consistent with global trends, the older-age population of the SCAG region is steadily growing. Understanding this demographic shift is vital for planning for the future. We want to better comprehend how an older population will live and travel—and how we can ensure they continue to fully engage in their communities. One of the clearest [insert]ramifications[end insert] [strikeout]implications[end strike] is [insert]seen in housing demand. Older people tend to live alone or in smaller households. Other major [insert]ramifications[end insert][strikeout]implications [end strike] include..."</p> <p>[See Table 1 in attached letter for denoted edits]</p>	Clarified.
0001777.072	<p>#72 Clarification & Correction, p. 81 Table 3.1</p> <p>Add note: "Numbers may not sum to total due to rounding."</p> <p>Noting the above, the SCAG totals in Table 3.1 and in Table 12 of the Demographics Technical Report do not match—though the county totals do match. The SCAG totals should match across tables and documents.</p>	Note added and corrections made.
0001777.073	<p>#73 Clarification, p. 82, column 3, paragraph 2, sentence 1</p> <p>"Reconnecting Communities: Historic physical and economic segregation was caused by [insert]some[end insert] U.S. housing and transportation policies and led to decades of inequalities. We are [insert]now[end insert] planning policies and projects that involve removing, retrofitting or mitigating highways or other transportation facilities that create barriers..."</p> <p>[See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.074	<p>#74 Clarification, p. 83, column 1, paragraph 2, last sentence</p> <p>"This program builds street-level community resilience and increase the safety of people most harmed by traffic injuries and fatalities, including without limitation, [insert]non-Hispanic[end insert] Black, Indigenous and [insert]other[end insert] People of Color; ..."</p> <p>[See Table 1 in attached letter for denoted edits]</p>	See response to comment 0001777.059.
0001777.075	<p>#75 Clarification, p. 83, column 2, paragraph 2, sentence 1</p> <p>"Inclusive Economic Recovery Strategy (IERS): This report was developed to address the long-standing social and economic challenges heightened by the [insert]responses to the[insert end] COVID-19 pandemic."</p> <p>[See Table 1 in attached letter for denoted edits]</p>	The text is updated.
0001777.076	<p>#76 Clarification, p. 85, column 1, paragraph 1, last sentence</p> <p>"The following goals and subgoals will help [insert]the[insert] SCAG [insert]region[end insert] to achieve this vision:"</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	The text is updated.
0001777.077	<p>#77 Clarification</p> <p>p. 87, first paragraph</p> <p>Is the Spring 2023 public outreach survey statistically significant? If not, it would not be an accurate statement to say there is pent up demand for more travel options as the survey data does not capture an accurate sample of the region.</p> <p>If anything, there is pent up demand for travel options for people who took the survey.</p> <p>Mobility Stories</p> <p>Explain how a freshman at Santa Ana College (SAC) relies on OC streetcar to get to class. OC Streetcar is not near SAC.</p>	The text is updated to clarify the survey results and the mobility story.

ID	COMMENT	RESPONSE
0001777.078	<p>#78 Clarification, p. 89 Funding the System/User Fees This paragraph discusses “user fees.” Clarify if this is essentially a VMT tax.</p>	<p>Comment noted. User fees are linked directly to how people travel. This could include fees per-mile, but also fees based on location or time of travel. User fee could also include fees for parking. The SCAG region currently has user fees on the express lanes.</p>
0001777.079	<p>#79 Clarification, p. 91, column 1, paragraph 1, sentence 3 “But capital investment alone is not sufficient to achieve our vision for the region’s future or meet our greenhouse gas (GHG) emission reduction goals [insert]set by CARB[end insert].” [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The text is updated.</p>
0001777.080	<p>#80 Clarification, p. 91, column 1, paragraph 1, sentence 2 “Connect SoCal 2024 increases investment and strengthens policy levers to optimize system performance while realizing greenhouse gas [strikeout]reduction[end strikeout] [insert]reductions [end insert] quickly and efficiently.” [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The text is updated.</p>
0001777.081	<p>#81 General Comment, p. 92 Retitle “Regional Express Lanes Network” to Regional Express Lanes, HOT and Toll Lane Network: The Priced Transportation Network. The text should then provide brief definitions of each type of facility that makes up the priced transportation network, as express lanes, toll roads and HOT lanes each operate differently.</p>	<p>Comment noted. The intention of this paragraph is focused on the concept of operations and buildout of the regional express lane network, and not ongoing operations of the existing tolled facilities in Orange County.</p>
0001777.082	<p>#82 Clarification, p. 94, map 3.1 • Add data year to title for Planned Transit Network • The Rapid Bus and Bus Rapid Transit routes are not legible. Additionally, explain where the “SCAG 2022” source derives from.</p>	<p>Comment noted. The data year is denoted at the bottom of the page after legend. The maps provided within Connect SoCal are intended to be viewed at a high level to understand the distribution of routes across the region. More datasets and interactive maps will become available following Plan adoption. Please note: the colors are clearer when the map is zoomed out. SCAG 2022 refers to the fact that SCAG developed and produced the map utilizing a variety of sources.</p>
0001777.083	<p>#83 Clarification, p. 95, map 3.2 • Add data year to title • Retitle “Regional Express Lanes Network” to Regional Express Lanes, HOT and Toll Lane Network: The Priced Transportation Network.</p>	<p>Comment noted. Since the tolls collected on the TCA-operated Toll Roads in Orange County are exclusively to pay debt service for construction of the facilities and do not provide incentives for carpooling, it would not be appropriate to include them directly in a discussion with express/HOT lanes without further explanation. Connect SoCal is updated to note the interoperability between the toll roads and the regional express lanes network.</p>
0001777.084	<p>#84 Clarification, p. 96, column 1, paragraph 2, sentence 3 In the following decade, [insert]these[end insert] [strikeout]this[end strikeout] grew [insert]by[end insert] 4.3 percent and 7.0 percent, respectively, sometimes [insert]as[end insert] [strikeout]in more[end strikeout] infill or [insert]more[end insert] location-efficient places than in decades prior.” [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The text is updated.</p>
0001777.085	<p>#85 Clarification, p. 96, column 2, paragraph 1, sentence 2-3 “While the ultimate oversight for this land-use law is the purview of the State Housing and Community Development Department, the allocation methodology was developed and adopted by SCAG’s Regional Council with a clear intent to align regional housing and the climate vision embedded in SCAG’s [insert]2020[end insert] RTP/ SCS. In contrast to past cycles when RHNA followed anticipated future population growth, the majority of the [insert]unit need[end insert] target (836,857) [strikeout]units[end strikeout] was allocated to address existing housing need during the 6th cycle.” [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The text is updated.</p>

ID	COMMENT	RESPONSE
0001777.086	<p>#86 Clarification, p. 97, column 1; paragraph 3; sentence 1</p> <p>"As part of developing a Sustainable Communities Strategy per Senate Bill 375 (SB 375), SCAG must include a "forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies..." will enable SCAG to reach its GHG emission reduction target of 19 percent below 2005 levels by 2035[insert], if feasible[end insert] ."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	The sentence has been updated to include "if feasible."
0001777.087	<p>#87 Clarification, p. 97, column 1, paragraph 1, sentence 3</p> <p>"For SCAG's purposes, this represents a framework for making our [insert]jurisdictions [end insert] [strikeout]cities[end strikeout] more inclusive, more equitable and more efficient by providing a range of mobility options and overall reduction in..."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	The text is updated.
0001777.088	<p>#88 Clarification, p. 97, column 2</p> <p>Add the consistency language to end of page:</p> <p>"In order to assess the ability of the Connect SoCal 2024 Plan to meet federal air quality standards and achieve a state greenhouse gas reduction target, SCAG creates small-area projections data for housing, population, and employment, which are known as the Tier 2 traffic analysis zone (TAZ) socioeconomic dataset (SED). Although these data are based in part on input provided by staff from local jurisdictions during the Connect SoCal 2024 Local Data Exchange process, local jurisdictions and projects within the region shall not be held to meet any specific numbers within or aggregates of the TAZ data. Connect SoCal 2024's TAZ-level household and employment projections are created to provide estimated snapshots in time. These projections do not reflect subsequently available information (given that local jurisdictions provided their local input to SCAG between May and December 2022); and, concerning some jurisdictions, they also do not reflect all currently entitled and pending projects. Additionally, the TAZ data do not project the full build-out and realization of localities' general plans; and they do not conform to jurisdictions' current respective housing elements. The local plans and approvals have continued and will continue to evolve; and market forces will continue to play a major role in determining the timing, locations, and different types of development and redevelopment that will occur. Therefore, the applicable jurisdiction(s) should be contacted for the most up-to-date data available.</p> <p>The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level.</p>	Consistency language added to Demographics and Growth Forecast Technical Report Section 5.5, Land Use and Communities Technical Report Section 7.5, and Supplementals section of Connect SoCal main book.

ID	COMMENT	RESPONSE
0001777.089	<p>#89 Clarification, p. 98, map 3.3 Forecasted Regional Development Pattern map shows growth increment of 2019-2050.</p> <ul style="list-style-type: none"> • Why does this show growth instead of Year 2050 densities? • Remove map or Replace map with Year 2050 densities. • If map is kept, add language "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level." • Relabel Freeways to Freeways/Toll Roads • Add "Growth, 2019-2050" to title 	<p>Comment noted. The Forecasted Regional Development Pattern is meant to showcase where Tier2 TAZ Household Density Growth is forecasted to occur between 2019-2050. The map will remain with the additional information Including:</p> <ul style="list-style-type: none"> • Relabel Freeways to Freeways/Toll Roads • Add "(Household Density Growth, 2019-2050)" to title <p>Include in note: For more information on Transportation Analysis Zones, PDAs, and GRRAs, please visit the Land Use and Communities Technical Report..</p> <p>A TAZ disclaimer has been added to section 7.5 of the Land Use and Communities Technical Report</p>
0001777.090	<p>#90 Correction, p. 99, column 2, paragraph 1, sentence 1 "The Regional Housing Needs [insert]Assessment[end insert][strikeout]Allocation[end strike] process takes place every eight years, as required by state law, or every other RTP/ SCS cycle." [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Housing the Region, column 2, paragraph 1, sentence 1 language has been changed to "The Regional Housing Needs Assessment process takes place every eight years, as required by state law, or every other RTP/ SCS cycle."</p>
0001777.091	<p>#91 Clarification, p. 97, column 1, paragraph 1, sentence 3 "PDAs are based on both existing conditions and future infrastructure, meaning that their boundaries reflect a snapshot in time based on data available at the time of Plan development. As such, these boundaries reflect a guide, and the location of PDAs used by local jurisdictions or for various programs or grants may differ."</p> <ul style="list-style-type: none"> • Sentence unclear. Possibly reword sentence or explain how do the PDA boundaries reflect a snapshot in time. • How do the PDA 'boundaries reflect a guide'? 	<p>Comment noted. Sentence removed.</p>
0001777.092	<p>#92 Clarification, p. 101, column 1; paragraph 2; last sentence "As a result, this Plan projects that only 7 percent of the region's future household growth will be located in SOIs outside of incorporated city boundaries from 2019 to 2050."</p>	<p>Language updated accordingly.</p>
0001777.093	<p>#93 Clarification, p. 102, map 3.4</p> <ul style="list-style-type: none"> • Add data year to title • The map is not legible; thus, we cannot properly comment on PDA locations. Additionally, explain the "SCAG 2023" derives from. 	<p>Comment noted. "SCAG 2023" indicates that the data was developed by SCAG and the source year is 2023. This map is intended to highlight where the Priority Development Areas are located throughout the SCAG region. Individual jurisdiction maps of PDAs can be found in the Data Map Guide published in November 2023.</p>
0001777.094	<p>#94 Clarification, p. 103, column 1, paragraph 3, sentence 2 "Therefore, SCAG's approach of de-emphasizing growth in areas with the highest number of convergences is sensitive to market considerations[insert], though some growth may still occur [end insert]." [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Revision has been made in Chapter 3.</p>
0001777.095	<p>#95 Clarification, p. 103, column 2, paragraph 4, sentence 2 "These areas at risk of interface fire losses are referred to by law as "Fire Hazard Severity Zones" (FHSZ)."</p> <ul style="list-style-type: none"> • What are "interface fire losses"? 	<p>Comment noted. "Interface" fire losses relate to impacts from wildfires in the Wildland Urban Interface (WUI). Refer to Section 5 in the Land Use and Communities Technical Report for the definition.</p>

ID	COMMENT	RESPONSE
0001777.096	<p>#96 Clarification, p. 104, column 1, paragraph 2 “Endangered Species and Plants: Location and condition of species of rare and sensitive plants, animals and natural communities in California[insert], see regulatory agencies, such as U.S. Fish and Wildlife [end insert].”</p> <ul style="list-style-type: none"> • SCAG should defer to regulatory agencies for definitions and regulations <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Connect SoCal 2024 uses the California Department of Fish and Wildlife’s California Natural Diversity Database (CNDDDB) for all rare, threatened, or endangered species and plants. Additional information on this dataset is included in Section 5 of the Land Use & Communities Technical Report.</p>
0001777.097	<p>#97 Clarification, p. 104, column 1, paragraph 4 “Natural Community and Habitat Conservation Plans: [insert](NCCP and HCP)[end insert] These plans identify and provide for the regional protection of plants...”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The text is updated.</p>
0001777.098	<p>#98 Clarification, p. 105, map 3.5</p> <ul style="list-style-type: none"> • Add data year to title • Relabel Freeways to Freeways/Toll Roads 	<p>Data utilized in Green Region Resource Areas varies by year for each data layer, and is further documented in Section 5.3 in the Land Use and Communities Technical Report.</p>
0001777.099	<p>#99 Clarification, p. 106, column 1, paragraph 1, sentence 3 “However, we know that alleviating the severity of the housing crisis requires a [insert]considerable[end insert] [strikeout]commiserate[end strikeout] commitment of resources.”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Language is changed to read “However, alleviating the severity of the housing crisis requires a commensurate commitment of resources.”</p>
0001777.100	<p>#100 Clarification, p. 109, column 1, paragraph 1, sentence 3 “The region must rise to meet the moment by investing in the adequate supporting infrastructure for all vehicle classes.”</p> <ul style="list-style-type: none"> • Reword “rise to meet the moment” 	<p>The text is updated.</p>
0001777.101	<p>#101 Clarification, p. 109, column 1, paragraph 2, sentence 3 [5]</p> <p>“However, both financial [insert], supply,[end insert] and infrastructure barriers are keeping many people in the region from transitioning to clean transportation.”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. The text has been revised to read: “However, financial, supply, and infrastructure barriers are keeping many people in the region from transitioning to clean transportation.”</p>
0001777.102	<p>#102 Clarification, p. 109, column 1, paragraph 3, sentence 3</p> <p>“Low-income communities are the most impacted from older-vehicle emissions, and an additional rebate program could serve to both accelerate the transition to cleaner vehicles and ensure that the related health [insert] benefits [end insert] also benefit SCAG’s Priority Equity Communities.”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment Noted. The text has been revised to read as “Low-income communities, most affected by emissions from older vehicles, could benefit significantly from an additional rebate program. Such a program would not only expedite the transition to cleaner vehicles but also ensure that SCAG’s Priority Equity Communities receive the corresponding health benefits.”</p>
0001777.103	<p>#103 Clarification, p. 111, column 2, last paragraph, sentence 2</p> <p>“By investing in a more efficient goods movement network, Universal Basic Mobility and improved access to recreational trails, [insert]the [end insert]SCAG [insert]region [end insert]is not only making broad improvements to the general regional economy but is focusing specifically on areas of disparity...”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The text is updated.</p>

ID	COMMENT	RESPONSE
0001777.104	<p>#104 Clarification, p. 111 [115], column 1</p> <p>“12. Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the existing transportation system [strikeout] instead of adding roadway capacity, where possible[end strikeout]”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. The language "instead of adding roadway capacity" was intentionally added to improve alignment with federal congestion management process requirements.</p>
0001777.105	<p>#105 Clarification, p. 117, column 1</p> <p>Add new under 41: “Support a mix of housing types throughout the region to support access for all levels of income—including single-family detached homes—to increase opportunity for equity-building through home-ownership for lower-income households.</p>	<p>Comment noted. SCAG supports local, regional and federal state efforts to produce and preserve affordable housing while meeting additional housing needs across the region.</p>
0001777.106	<p>#106 Clarification, p. 118, column 1</p> <p>“49. [insert]Promote [end insert][strikeout] Implement[end strikeout] the Forecasted Regional Development Pattern of Connect SoCal 2024, consisting of household and employment projections that have been reviewed and refined by jurisdictions and stakeholders to advance this shared framework for regional growth management planning”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. This policy has been updated to better reflect how a local jurisdiction may consider SCAG's Forecasted Regional Development Pattern.</p>
0001777.107	<p>#107 General Comment, p. 119</p> <p>Climate resilience policies seem to be lacking as far as transportation infrastructure is concerned. Consider policies here that encourage:</p> <ul style="list-style-type: none"> -embedding climate resilience into transportation infrastructure planning and management -transportation infrastructure capital investments and innovation to scale climate resilience -help communities achieve resilience, safety, health, equity and economic vitality 	<p>Though Connect SoCal's policies already address climate resilience, their connection to transportation is updated as noted below.</p> <p>Transit and Multimodal Integration Policy: Create a resilient transit and rail system by preparing for emergencies and the impacts of extreme weather conditions. Revised to read: Create a resilient transportation system by preparing for emergencies and the impacts of climate change.</p> <p>Climate Resilience Policy: Support local and regional climate and hazard planning and implementation efforts. Revised to read: Support local and regional climate and hazard planning and implementation efforts for both transportation and land use.</p> <p>Connect SoCal's strategies also address the role of transportation in supporting climate resilience as highlighted in the following Transit and Multimodal Integration Strategy: Support community-led Complete Streets plans and projects, including those that take into account how to mitigate or adapt to climate change impacts (e.g., extreme heat).</p>
0001777.108	<p>#108 Comment, p. 121, Regional Planning Policy #89 (Tourism)</p> <p>Encouraging alternative modes of transportation for tourist traveling to the SCAG region does not seem feasible. What other modes of transportation would allow a visitor to easily travel from the airport to the city, to the mountains, to the beach?</p>	<p>Comment noted. The word "alternative" is often used in the Travel and Tourism technical report in reference alternatives to private vehicle usage with transit being cited as one of the other "alternative" options. Travelers already use transit to travel from the airport to the city, and to the mountains and beaches. Although transit is often not the most popular travel option, there are opportunities to encourage transit (versus private vehicles). Furthermore, there are also options for active transportation (e.g., walking, biking) to travel to the beaches, parks, and other tourist destinations (e.g., from hotels in beach cities to the nearby beaches).</p>

ID	COMMENT	RESPONSE
0001777.109	<p>#109 Clarification, p. 121, column 1</p> <p>“81. Promote [insert]an [end insert] increased [insert]variety of [end insert]payment credentials for disadvantaged community members and the transition of cash users to digital payment technologies to address payment barriers”</p> <ul style="list-style-type: none"> • What are “payment credentials”? <p>[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. Payment credentials refer to ways to verify a user, which can expand payment options for low-income and unbanked users beyond only cash payments.</p>
0001777.110	<p>#110 Clarification, p. 121, column 2</p> <p>“89. Encourage the reduced use of cars by visitors to the region by working with state, county and city agencies to highlight and increase access to [insert] safe [end insert] alternative options, including transit, passenger rail and active transportation”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. Narrative text will be edited to provide clarification. Will add the following text (e.g., park services, transportation agencies) for clarification. The sentence will now read "Encourage the reduced use of cars by visitors to the region by working with state, county and city agencies (e.g., park services, transportation agencies..."</p>
0001777.111	<p>#111 Clarification, p. 123, column 1; paragraph 1</p> <p>Add clarification information for the table starting on page 124 by inserting following to page 123's first paragraph:</p> <p>[insert] Note that the list of other responsible parties is not exhaustive. The strategies starting on the following page identify areas where SCAG can:</p> <ul style="list-style-type: none"> • Lead: SCAG may act as a collaboration leader, advocate on state or federal legislation and/or initiate new research in furtherance of SCAG's policies and goals. SCAG already has or will begin to move forward on this strategy. • Partner: SCAG may provide technical assistance or grant resources to jurisdictions, agencies, organizations, and other entities in furtherance of SCAG's policies and goals. Successful implementation of the strategy will depend on other governments, agencies or organizations, and entities. SCAG already has or will begin to move forward on this strategy. • Support: SCAG will provide ongoing support (toolbox Tuesday, provide subject matter expert presentations to elected officials, letters of support in grant applications) to efforts led by other agencies or organizations. While SCAG does not have a direct and tangible role to move forward on this strategy, it remains engaged to provide continued support to advance projects that further SCAG's policies and goals. [end insert] <p>[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. Connect SoCal 2024 does not include specific definitions for how SCAG can lead, partner or support other responsible parties in implementation but instead references SCAG's broader methods of implementation. For each of the nearly 100 Implementation Strategies included in Connect SoCal 2024, the specificities of leading, partnering or supporting will be unique according to the needs of the strategy and the relationships with the other responsible parties.</p>
0001777.112	<p>#112 Clarification, p. 124</p> <ul style="list-style-type: none"> • Add table number and table title • Add asterisk to “Other Responsible Parties*” and display footnote on each page: “[insert]List of parties is not exhaustive[end insert]” <p>[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. The introductory text is updated to clarify responsible parties.</p>

ID	COMMENT	RESPONSE
0001777.113	<p>#113 Correction, p. 124</p> <p>First strategy – consider adding “performance” to “..regional [insert] performance [end insert] targets..”to denote an ongoing process of monitoring and adaptive management.</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	SCAG is applying these updates.
0001777.114	<p>#114 Revision, p. 124, Mobility, Complete Streets Strategy</p> <p>Revise the Strategy #4, SCAG should not take the lead in developing a complete streets network. This type of effort would require [sic]</p>	<p>Comment noted. SCAG recognizes the value of locally-developed Complete Streets networks. SCAG would advance this strategy by working with local jurisdictions, transit/rail authorities, and County Transportation Commisisions to integrate locally-developed Complete Streets networks into a regional network that informs regional policies and plans, including consideration of their impacts on equity areas.</p>
0001777.115	<p>#115 Clarification, p. 125</p> <p>Strategy #6. SCAG role, Partner? (Maybe Support?) SCAG has no land use authority, what would SCAG’s role be as Partner.</p>	<p>SCAG is revising the text to read: "Transit/Rail. Through land use planning, support residential development along high-frequency transit corridors and around transit/rail facilities and centers."</p> <p>For reference, the prior text reads: "Transit/Rail. Through land use planning, build residential development along high-frequency transit corridors and around transit/rail facilities and centers."</p>
0001777.116	<p>#116 Clarification, p. 125</p> <p>Strategy #9. Not clear what this strategy entails</p>	<p>Comment noted. SCAG received federal funding to develop a Highways to Boulevards Regional Study, which will identify opportunities to reconnect communities by removing, retrofitting, or mitigating transportation facilities such as highways or railways that create barriers to community connectivity. SCAG is engaging stakeholders from across the region from November 2023 through April 2025. The Study will result in conceptual designs for a subset of priority projects to ensure that they can compete for grant funding. The Study will also result in the creation of a guide for jurisdictions to mitigate the negative impacts of transportation facilities.</p>
0001777.117	<p>#117 Clarification, p. 125, 128, 129, 132 Table footnote</p> <p>** (Asterisks) denote strategies that support quantified GHG emission strategies that help to reach SCAG’s [insert] greenhouse gas reduction [end insert] target [insert] set by CARB [end insert].”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	The text is updated.
0001777.118	<p>#118 Clarification, p. 126</p> <p>Strategy #3. What’s the purpose of developing more TMAs/TMOs? Is this in areas where none TMA’s exist? Does CTC initiate this?</p>	<p>Comment noted. Connect SoCal's Transportation Management Agencies/Organizations (TMAs/TMOs) strategy is consistent with a recommendation to increase transportation demand management (TDM) effectiveness from SCAG's TDM Strategic Plan (2019), which was incorporated into Connect SoCal 2020. TMAs/TMOs work with both the public and private sectors to facilitate TDM for employees, residents and visitors within a defined area. If well implemented and resourced, TMAs/TMOs can be instrumental in reducing SOV trips and vehicle miles traveled and furthering the goals of Connect SoCal. Currently, about 10 TMAs exist within the SCAG region, covering a relatively small footprint. This strategy would support growth of TMAs/TMOs in areas where there currently are not any. County Transportation Commissions as well as local jurisdictions can support their formation and growth.</p>
0001777.119	<p>#119 Correction, p. 127</p> <p>Strategy #s 5 and 8. Add Transit/Rail Agencies to “Other Responsible Parties” or add an asterisk to say the list of agencies under “Other Responsible Parties” is not exhaustive (unless if others feel its implied)</p>	The text is updated.

ID	COMMENT	RESPONSE
0001777.120	<p>#120 Clarification, p. 128</p> <p>Strategy #4. This is the only Strategy under which, "Toll Authorities" are mentioned. How are toll authorities defined?</p>	"Toll Authorities" is removed to avoid confusion. The strategy now reads "Lead: Caltrans, CTCs"
0001777.121	<p>#121 Clarification, p. 129, line 2 (second item under Priority Development Areas)</p> <p>"[strikeout] Develop [end strikeout] [insert] Support [end insert] housing in areas with existing and planned infrastructure and availability of multimodal options, and where a critical mass of activity can promote location efficiency."</p> <p>Change from "partner" to "support."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	Comment noted. "Develop housing" replaced with "Support the development of housing."
0001777.122	<p>#122 Clarification, p. 129</p> <p>Strategy #1. SGC under Other Responsible Parties. Define at first use. (Strategic Growth Council)</p>	See glossary.
0001777.123	<p>#123 Clarification, p. 129</p> <p>Strategy #5, households of color, should this be BIPOC (Black, Indigenous and People of Color)</p>	Comment noted. The Main Book and Technical Reports consistently utilize "people of color", "communities of color", or "households of color".
0001777.124	<p>#124 Clarification, p. 131</p> <p>Strategy #s 2 and 7 No other responsible parties? Local jurisdictions. Private sector companies?</p>	<p>In regards to strategy #2:"n/a" is changed to read "Local jurisdictions, private sector companies, regional partners, state and federal agencies"</p> <p>In regards to strategy#7: "n/a" is changed to read "Local jurisdictions, private sector companies, regional partners, state and federal agencies"</p>
0001777.125	<p>#125 Clarification, p. 132</p> <p>Strategy # 1. The strategy is for PPP but Private Sector Companies are not identified in the Other Responsible Parties</p>	<p>Comment noted. The approach outlined by SCAG emphasizes that the primary role in encouraging public-private partnerships should be taken by local jurisdictions. This strategy focuses on local authorities leading the way in creating a supportive environment that attracts private sector participation and engagement.</p> <p>"Private sector" has been added as a support agency under the strategy which states Facilitate Development of EV charging infrastructure through public-private partnerships."</p>
0001777.126	<p>#126 Clarification, p. 132</p> <p>Strategy # 2. The strategy is to assist local jurisdictions, but the SCAG role disposition is "Lead" Consider changing to Support or Partner</p>	Comment noted. To clarify, SCAG is indicating its commitment to spearhead support for local jurisdictions in creating an incentive program aimed at encouraging the wider adoption of zero-emission vehicles.
0001777.127	<p>#127 General Comment, p. 132</p> <p>Natural and Agricultural Lands Preservation. While part of "natural lands" wetlands, due to their importance in the ecosystem should be called out. For example, ref to "...conserve and restore [insert]wetlands,[end insert] natural and agricultural lands.." [The PEIR defines Natural lands as Biologically diverse landscapes such as forested and mountainous areas, shrub lands, deserts and other ecosystems which contain habitat that supports wildlife and vegetation].</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	Comment noted. Wetlands are included in natural lands, and associated data are featured in the Sensitive Habitat Areas category of the Green Region Resource Areas, as discussed in Section 5.3 within the Land Use and Communities Technical Report. As such, these areas were considered in the development of Connect SoCal's Forecasted Regional Development Pattern.

ID	COMMENT	RESPONSE
0001777.128	<p>#128 General Comment, p. 132</p> <p>Strategy #6. RAMP VMT mitigation. "Work with implementation agencies to support, establish or supplement [insert]elective[end insert] regional advance mitigation programs (RAMP) for regionally significant transportation projects to mitigate environmental impacts, reduce per-capita VMT and provide mitigation opportunities through the Intergovernmental Review Process" [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The text is amended to "Work with implementation agencies to support, establish, or supplement voluntary Regional Advance Mitigation Programs (RAMP) for regionally significant transportation projects that help mitigate environmental impacts and reduce per-capita Vehicle Miles Traveled (VMT), and provide enhanced data on mitigation opportunities through the Intergovernmental Review Process."</p>
0001777.129	<p>#129 General Comment, p. 132</p> <p>Strategy #8. Consider rewording to be consistent with Policy #62 on p119, you typically don't restore wildlife corridors. Suggest, "Support the integration of nature-based solutions into implementing agency plans to address urban heat, organic waste reduction, [insert]protect and restore wetlands and natural habitats,[end insert] [strikeout]habitat and wildlife corridor restoration[end strikeout], greenway [insert]and wildlife[end insert] connectivity and similar efforts." [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. Text has been amended to read "Support the integration of nature-based solutions into implementing agency plans to address urban heat, organic waste reduction, protection of wetlands, habitat and wildlife corridor restoration, greenway connectivity and similar efforts."</p>
0001777.130	<p>#130 General Comment, p. 133</p> <p>Strategy #2. SCAG role should be Partner/Support since local jurisdictions are responsible for developing their own CAPs</p>	<p>Comment noted. This strategy refers to SCAG's development of regional programs that will ultimately support the development of local CAPs, and not the development of CAPs themselves.</p>
0001777.131	<p>#131 Clarification, p. 134</p> <p>Strategy #2. Clarify if MSRC is a SCAG committee</p>	<p>The MSRC is not a SCAG Committee.</p>
0001777.132	<p>#132 Clarification, p. 134</p> <p>Strategy #8. Who issues the regional/statewide universal permit?</p>	<p>Comment Noted. The State of California is streamlining the permitting process for electric vehicle charging stations (EVCS) through legislative measures and practical guidelines. Assembly Bills 1236 and 970, if enacted, will mandate cities and counties to adopt expedited, streamlined permitting procedures for EVCS. This involves the creation of an ordinance that aligns with a Permitting Scorecard's criteria, which ensures jurisdictions meet certain streamlined standards.</p> <p>A universal permit will not be developed or issued by the State. Jurisdictions would be responsible for developing a checklist to make the application process clear and straightforward, and it must be readily available online. These steps aim to simplify and accelerate the process of EVCS installations, encouraging collaboration between cities, counties, and developers.</p> <p>Strategy #8, on Page 134 will be revised to no longer reflect EV Charging Infrastructure.</p>
0001777.133	<p>#133 Clarification, p. 135, column 1</p> <p>"Continue to develop an understanding of low-income travel patterns and needs, and the impact of shocks (e.g., [strikeout]COVID[end strikeout][insert]pandemic response[end insert] and telework adoption) on low-income travel" [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The text is updated.</p>
0001777.134	<p>#134 Clarification, p. 138</p> <p>"This chapter ... to meet milestones to implement Connect SoCal [insert]2024[end insert]." [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The text is updated.</p>
0001777.135	<p>#135 Clarification, p. 139; all pages</p> <p>"FIGURE 4.1 FY20[insert]24/[end insert]25–FY20[insert]49/[end insert]50 RTP/SCS Revenues (in Nominal Dollars, Billions)"</p> <ul style="list-style-type: none"> • Add full fiscal year identifiers to clarify the years covered in all figures and references <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. Fiscal Year commonly refers to the year in which the fiscal year ends.</p>

ID	COMMENT	RESPONSE
0001777.136	<p>#136 Clarification, p. 139; all references to SCAG Financial Model 2023 "SCAG [insert]Connect SoCal[end insert] Financial Model 2023</p> <ul style="list-style-type: none"> • Add Connect SoCal reference to sources regarding financial model • P. 150, 154, 155, 156, 171 <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. Because the Financial Model is a part of Connect SoCal, it is not necessary, and could cause confusion, if we added this label within the text of Connect SoCal.</p>
0001777.137	<p>#137 Clarification, p. 139; Figure 4.2 "[insert]Operations and Maintenance[end insert] (O&M[insert])[end insert] Transit"</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The text referring to Table 4.2 is updated to indicate that "O&M" refers to Operations and Maintenance.</p>
0001777.138	<p>#138 Clarification, p. 135; column 2, sentence 2 "The COVID-19 pandemic [insert]response[end insert] has had a significant impact on travel patterns and economic activity, and..."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The text is updated.</p>
0001777.139	<p>#139 Clarification, p. 144; Figure 4.3 "FIGURE 4.3 Historical Inflation Trends ([insert]Year-Over-Year[end insert] Annual Inflation)"</p> <ul style="list-style-type: none"> • Add label "Inflation" to Y-axis • Why is inflation only through 2019? • X-axis only shows to 2018 <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The y-axis label is updated. Because we show inflation annualized to 2019, which is the Connect SoCal base year, the x-axis only shows to 2018. 2019 inflation cannot be annualized to 2019.</p>
0001777.140	<p>#140 Clarification, p. 145; Figure 4.4 Add label "Index (2020=100)" to Y-axis</p>	<p>The y-axis label is updated to clarify that it is index values.</p>
0001777.141	<p>#141 Clarification, p. 146; column 1; paragraph 1; sentence 2 "Suppressed consumer spending during the initial pandemic [insert]response[end insert] period resulted in significant declines in retail sales [insert]due to shutdowns in response to the pandemic[end insert]. Likewise, recessions and economic slowdowns also reduce personal consumption."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. This paragraph describes the trends in retail sales during a period of time, and it is not necessary to attribute causes for these trends in this section.</p>
0001777.142	<p>#142 Clarification, p. 146; column 1; paragraph 2; sentence 2 "...Though changes in regional vehicle miles traveled will continue to play a role during the Plan period, increases in conventional fuel efficiency and the adoption of alternative fuel and alternative-powered vehicles will reduce overall fuel consumption."</p> <ul style="list-style-type: none"> • What is the reference to "regional" vehicle miles traveled? 	<p>Comment noted. "Regional" vehicle miles traveled refers to vehicle miles traveled in the SCAG region over the life of the Plan.</p>
0001777.143	<p>#143 Clarification, p. 146; column 2; paragraph 3; sentence 1 "At the time of the [insert]2024[end insert] Connect SoCal Plan, three decades have passed without substantive Congressional agreement on a long-term solution..."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The text is updated to clarify which Plan.</p>
0001777.144	<p>#144 Clarification, p. 153; Table 4.2</p> <ul style="list-style-type: none"> • Replace "Total" with "SCAG Region" at bottom of table. • Add note that fiscal year indicates the date the fiscal year ends • Right-justify all data columns. 	<p>Comment noted. Fiscal year naming convention is that the name reflect the ending year.</p>

ID	COMMENT	RESPONSE
0001777.145	<p>#145 Correction, p. 154; column 1; paragraph 1; sentence 2 "The share of state sources (32 percent) is relatively unchanged since the [insert]2020[end insert] [strikeout]last[end strikeout] RTP/SCS." [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	Comment noted.
0001777.146	<p>#146 Clarification, p. 154; Figure 4.8 • Add population share of region into the legend showing the share of revenue.</p>	<p>Comment noted. Each county's share of the region's population can be derived from Table 3.1 and more information can be found in the Demographics & Growth Forecast Technical Report. Because population growth rates vary across the counties, each county's share of regional population will vary over the Plan period.</p>
0001777.147	<p>#147 Clarification, p. 157; column 2; paragraph 1; sentence 5 "... These factors include technology and associated privacy issues, cost of implementation and administrative methods for fee collection/revenue allocation and potential equity concerns." • Add Oxford comma to clarify which statement is accurate: • These factors include technology and associated privacy issues, cost of implementation[insert], [end insert] and administrative methods for fee collection/revenue allocation and potential equity concerns." • These factors include technology and associated privacy issues, cost of implementation and administrative methods for fee collection/revenue allocation[insert],[end insert] and potential equity concerns." [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Description of Table 4.3 updated to include: "These factors include technology and associated privacy issues, cost of implementation and administrative methods for fee collection/revenue allocation, and potential equity concerns."</p>
0001777.148	<p>#148 Clarification, p. 159; column 2; Local Road Charge Program "Local road charge program assumes a \$0.020 (in 2019 dollars) per mile charge throughout the region that can be implemented on a county basis." • How would this be done for residents vs. visitors?</p>	<p>Comment noted. SCAG staff will continue to work with county transportation commissions and other stakeholders to evaluate the impacts of the new transportation user fees. SCAG's key guiding principles for financial strategies promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. The Local Road Charge included in Connect SoCal 2024 assumes leveraging state and federal mileage-based user fee system technology to ensure interoperability and facilitate allocation of resulting revenues to reflect system usage.</p>
0001777.149	<p>#149 Correction, p. 160; column 2 "Transportation Development Act (TDA)... Description: The Local Transportation Fund (LTF) is derived from a ¼ [insert]percent[end insert] [strikeout]cent [end strikeout] sales tax on retail sales statewide." [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	This is an error and cent is replaced with percent.
0001777.150	<p>#150 Correction, p. 162; column 2; RMRA sentence 2 "Description: The RMRA... Although the RMRA also provides SHOPP funding, for purposes of the [insert]2024 [end insert] [strikeout]2020 [end strikeout] RTP/SCS financial plan, it only reflects the portion directed to counties and cities." [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	The second sentence describing the RMRA is changed to read "the 2024 RTP/SCS financial plan".
0001777.151	<p>#151 Clarification, p. 168; column 1; sentence 2 "Efforts are underway to explore transition from our current fuel tax-based system [strikeout] based [end strikeout] to a more direct system of road user fees." [See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	This is an error and the second "based" is removed from the sentence.

ID	COMMENT	RESPONSE
0001777.152	<p>#152 Clarification, p. 174; paragraph 2</p> <p>“The Connect SoCal 2024 performance monitoring program integrates federal transportation system performance management and Equity/Environmental Justice measures and metrics specific to a set of federal transportation conformity planning, reporting requirements for designated criteria air pollutants and to support the achievement of regional greenhouse gas emissions reduction targets established by the California Air Resources Board.”</p> <ul style="list-style-type: none"> • Sentence is incomplete 	<p>Comment noted. We will review referenced paragraph describing the Connect SoCal performance monitoring program and revise as needed.</p>
0001777.153	<p>#153 Clarification, p. 178; column 4</p> <p>“[strikeout] \$1.00 < \$2.00 [end strikeout] [insert] \$1.00 = \$2.00 [end insert] INVESTMENT BENEFIT \$754 [insert] Average [end insert] Annual Transportation Cost Savings per Household 277,800 [insert] Average [end insert] Annual New Jobs from Transportation Investments 480,100 [insert] Average [end insert] Annual New Jobs from Transportation Investments and Increased Competitiveness”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. Chapter updated.</p>
0001777.154	<p>#154 Clarification, p. 182; paragraph 2; sentence 2</p> <p>“Improving the region’s mobility and enabling more sustainable development can provide [strikeout] a [end strikeout] myriad of co-benefits, including reduced energy and water use.”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The text is updated.</p>
0001777.155	<p>#155 Clarification, p. 183; column 2; paragraph 1; sentence 3</p> <p>“A livable community is defined by a cohesive, [insert] physically [end insert] active and engaged population.”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. This paragraph has been updated and the term livable community is no longer referenced.</p>
0001777.156	<p>#156 Clarification, p. 186; column 1; paragraph 2; sentence 3</p> <p>“However, decreased travel during the [insert] shutdowns in response to the [end insert] COVID-19 pandemic most likely helped the achievement of the 2020 target, so continued effort will be necessary to sustain progress and Plan implementation to reach the 2035 target.”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>This sentence is updated.</p>

ID	COMMENT	RESPONSE
0001777.157	<p>#157 Clarification, p. 188; column 1; paragraph 2; sentence 2</p> <p>“The increased competitiveness and improved economic performance [insert] created [end insert] [strikeout] induced [end strikeout] by these expenditures will generate an additional 202,300 jobs per year [insert] on average [end insert] due to enhanced network efficiency.”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	Comment noted. Clarification made in Chapter 5.
0001777.158	<p>#158 Clarification, p. 188; column 2; paragraph 1; sentence 2</p> <p>“The purpose of the Equity Analysis is to evaluate the potential impacts of the implementation of the Plan on communities, including both protected populations, as defined by federal regulation, and priority communities, as identified by SCAG and regional stakeholders. The preparation of the [insert] Plan [end insert] [strikeout] report [end strikeout] relied heavily...”</p> <ul style="list-style-type: none"> • Define ‘protected populations’ and ‘priority communities’ <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The suggested text change is applied to state “The preparation of the Plan relied heavily....” For the definitions requested, “protected populations” are discussed in the Equity Analysis Technical Report under Section 2.2, third paragraph in the definition of “equity” (Federal Executive Order 13985), and in Section 3. “Priority communities” are inclusive of the “priority populations” as described in Table 3 of the Equity Analysis Technical Report that make up Priority Equity Communities.</p>
0001777.159	<p>#159 Clarification, p. 188; column 2; paragraph 2; sentence 1</p> <p>“One method SCAG used to determine if the Plan caused disproportionate and adverse impacts to historically marginalized and disadvantaged communities is through the identification and assessment of Priority Equity Communities.</p> <ul style="list-style-type: none"> • Define ‘historically-marginalized community’ 	<p>A “historically-marginalized community” can be summarized by the federal definition for equity from Executive Order 13985, which includes “individuals who belong to underserved communities that have been denied consistent and systemic fair, just, and impartial treatment...” The full definition is included in Section 2.2 of the Equity Analysis Technical Report.</p>
0001777.160	<p>#160 Clarification, p. 188; column 2; paragraph 2; last sentence</p> <p>“For more detail on the methodology used to develop Priority Equity Communities, see the Equity Analysis [insert] in Section... or in Technical Report...[end insert]”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The last sentence of the paragraph under “Priority Equity Communities” in Chapter 5 of the Plan is revised from “For more detail on the methodology used to develop Priority Equity Communities, see the Equity Analysis.” to “For more detail on the methodology used to develop Priority Equity Communities, see Section 4.2 of the Equity Analysis Technical Report.”</p>
0001777.161	<p>#161 Clarification, p. 189; Map 5.1</p> <ul style="list-style-type: none"> • Add year to title • Add note to map: “Priority Equity Communities are census tracts in the SCAG region that have a greater concentration of populations that have been historically marginalized and are susceptible to inequitable outcomes based on several socioeconomic factors.” 	<p>Map 1 of the Equity Analysis and Map 5.1 of Chapter 5 of the Plan are revised to include the year and definition of Priority Equity Communities.</p>
0001777.162	<p>#162 Clarification, p. 191; column 2; line 4</p> <p>“Number of [insert] jobs???employers???[end insert] [strikeout] employments reachable within [insert] 15-30 [end insert] [strikeout] 15/30 [end strikeout] minutes by automobile and [insert] 15-45 [end insert] [strikeout] 15/45 [end strikeout] minutes by transit during morning peak period (6 a.m.–9 a.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The descriptions of the Access to Everyday Destinations performance measures in Table 5.3 in Chapter 5 of the Plan, Table 1 of the Equity Analysis Technical Report, and Table 5 of the Performance Monitoring Technical Report are revised to distinguish between the travel time thresholds.</p> <p>The description is also revised to clarify that the measure is for the “Number of jobs reachable...”</p>

ID	COMMENT	RESPONSE
0001777.163	<p data-bbox="205 94 604 115">#163 Clarification, p. 191; column 2; line 5</p> <p data-bbox="205 151 1123 261">"Number of retail establishments reachable within [insert] 15-30 [end insert] [strikeout] 15/30 [end strikeout] minutes by automobile and [insert] 15-30 [end insert] [strikeout] 15/30 [end strikeout] minutes by transit during the midday period (9 a.m.–3 p.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds"</p> <p data-bbox="205 293 1123 349">[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.162.
0001777.164	<p data-bbox="205 358 604 380">#164 Clarification, p. 191; column 3; line 1</p> <p data-bbox="205 415 1123 586">"This analysis confirmed [insert] the [end insert] typical patterns [insert] that [end insert] [strikeout] of [end strikeout] higher income transit riders tend to ride the train, while lower income transit riders tend to ride the bus. [insert] Non-Hispanic [end insert] Black travelers had the lowest automobile mode share, while Hispanic/Latino and [insert] non-Hispanic [end insert] Asian travelers had the highest. [insert] non-Hispanic [sic] m[end insert][strikeout]M[end strikeout]ultiracial travelers reported the highest walking and biking mode shares."</p> <p data-bbox="205 618 1123 667">[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p data-bbox="1136 358 2064 496">A note is added to Table 5.3 in Chapter 5 of the Plan and Table 1 of the Equity Analysis Technical Report to clarify that references "to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) [in this table] are not of Hispanic/Latino ethnicity, unless stated otherwise." Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context.</p> <p data-bbox="1136 529 2064 586">The summary of analysis is also revised to clarify "This analysis confirmed the typical patterns that higher income riders..."</p>
0001777.165	<p data-bbox="205 677 604 698">#165 Clarification, p. 191; column 3; line 2</p> <p data-bbox="205 734 1123 844">"Results anticipate increases in miles traveled on transit and decreases in miles traveled by auto in accordance with the integrated transportation and land use strategies proposed in Connect SoCal. There are slightly greater decreases in person miles traveled for lower income quintiles and for [insert] non-Hispanic [end insert] Black and [insert] non-Hispanic [end insert] Asian travelers."</p> <p data-bbox="205 876 1123 932">[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.164.
0001777.166	<p data-bbox="205 941 604 963">#166 Clarification, p. 191; column 3; line 3</p> <p data-bbox="205 998 1123 1109">"Results anticipate increases in time spent on transit and decreases in time spent traveling by auto in accordance with the integrated transportation and land use strategies proposed in Connect SoCal. There are slightly greater decreases in person hours traveled for higher income quintiles and for Hispanic/Latino and [insert] non-Hispanic [end insert] White travelers."</p> <p data-bbox="205 1141 1123 1196">[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.164.
0001777.167	<p data-bbox="205 1206 604 1227">#167 Clarification, p. 191; column 3; line 4</p> <p data-bbox="205 1263 1123 1433">"Access to jobs is expected to improve for the overall population in the region and in Priority Equity Communities, however, there are several decreases in auto access to jobs for specific populations in Priority Equity Communities, including [insert] non-Hispanic [end insert] Black, Hispanic/Latino, the two lowest income [edit] quintiles, and [end edit] households below the Federal Poverty Level, limited-English proficiency [edit] population, and [end edit] zero-vehicle households."</p> <p data-bbox="205 1466 1123 1516">[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.164.

ID	COMMENT	RESPONSE
0001777.168	<p data-bbox="205 94 604 115">#168 Clarification, p. 191; column 3; line 5</p> <p data-bbox="205 152 1123 261">“Access to shopping is expected to improve for the overall population in the region and in Priority Equity Communities, however, there are slight decreases in auto access for the [insert] non-Hispanic [end insert] Black population and in bicycle access for the Hispanic/Latino population in Priority Equity Communities.”</p> <p data-bbox="205 293 1123 349">[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.164.
0001777.169	<p data-bbox="205 360 604 381">#169 Clarification, p. 192; column 2; line 1</p> <p data-bbox="205 418 1123 527">“Percent of population that can reach a park location within [insert] 15-30 [end insert] [strikeout] 15/30 [end strikeout] minutes by automobile and [insert] 15-30 [end insert] [strikeout] 15/30 [end strikeout] minutes by transit during the midday period (9 a.m.–3 p.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”</p> <p data-bbox="205 560 1123 615">[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.162.
0001777.170	<p data-bbox="205 626 604 647">#170 Clarification, p. 192; column 2; line 2</p> <p data-bbox="205 685 1123 794">“Number of schools within [insert] 15-30 [end insert] [strikeout] 15/30 [end strikeout] minutes by automobile and [insert] 15-30 [end insert] [strikeout] 15/30 [end strikeout] minutes by transit during morning peak period (6 a.m.–9 a.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”</p> <p data-bbox="205 826 1123 881">[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.162.
0001777.171	<p data-bbox="205 893 604 914">#171 Clarification, p. 192; column 2; line 3</p> <p data-bbox="205 951 1123 1060">“Number of health care facilities within [insert] 15-30 [end insert] [strikeout] 15/30 [end strikeout] minutes by automobile and [insert] 15-30 [end insert] [strikeout] 15/30 [end strikeout] minutes by transit during the midday period (9 a.m.–3 p.m.), plus 0.5- 0.75-, and 1-mile walksheds and 1-, 3- and 5-mile bikesheds”</p> <p data-bbox="205 1092 1123 1148">[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.162.
0001777.172	<p data-bbox="205 1159 604 1180">#172 Clarification, p. 192; column 3; line 1</p> <p data-bbox="205 1218 1123 1349">“...The largest decreases are for [insert] non-Hispanic [end insert] Hawaiian-Pacific Islander and [insert] non-Hispanic [end insert] Native American populations where the decrease in auto access in Priority Equity Communities exceeds the regional change; and for the [insert] non-Hispanic [end insert] Native American population where the decrease in bicycle access in the region exceeds the decrease in Priority Equity Communities. ”</p> <p data-bbox="205 1382 1123 1437">[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.164.

ID	COMMENT	RESPONSE
0001777.173	<p>#173 Clarification, p. 192; column 3; line 2</p> <p>“Access to schools... while transit access decreases for [insert] non-Hispanic [end insert] Black people and zero-vehicle households in the region but increases for the same populations in Priority Equity Communities. ”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.164.
0001777.174	<p>#174 Clarification, p. 192; column 3; line 3</p> <p>“Access to healthcare... except for auto decreases for [insert] non-Hispanic [end insert] Black and Hispanic/Latino populations, all but the highest income quintile, and all other priority populations analyzed in Priority Equity Communities, despite increases at the regional level. ”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.164.
0001777.175	<p>#175 General Comment, p. 193 [Mobility Technical Report]</p> <p>The section on “Other Freeway or Expressway” should be expanded to include a detailed coding of the region’s freeway system (mixed-flow lane, auxiliary lane, HOV lane, HOT lane, toll lane, and truck lane, [insert] toll roads,[end insert] etc.)</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	Comment noted. The Functional Classifications described in this section - of which “Other Freeway or Expressway” is just one - are defined and categorized as such by Caltrans and FHWA. SCAG references these categories, as defined, for consistency. Please see later sections of text in this report (e.g., Section 4.3.2: Existing Transportation System) for a more detailed discussion of the region’s freeway system by lane type (e.g., Managed Lanes, HOV Lanes, Regional Express Lanes, etc.).
0001777.176	<p>#176 Clarification, p. 193; column 3; line 3</p> <p>“Gentrifying neighborhoods and those with high eviction filings had higher percentages of [insert] non-Hispanic [end insert] Black and Hispanic/Latino people...”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.164.
0001777.177	<p>#177 Clarification, p. 193; column 3; line 4</p> <p>“In the base year, there is a higher concentration of low-income [insert] people???households??? [end insert] and some people of color in areas adjacent to railroads and railyards, and it is expected that this concentration [insert]may[end insert][strikeout] could [end strikeout] grow in the Baseline and Plan scenarios. SCAG anticipates nominal Plan impact, and that population changes would generally follow that of the SCAG region.”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	Table 1, column 3, rail-related impacts measure for demographic analysis for areas in close proximity to rail corridors and railyards is revised from "...there is a higher concentration of low-income and ... it is expected that this concentration could grow ... SCAG anticipates nominal plan impact..." to read "... there is a higher concentration of low-income households and ... it is expected that this concentration may grow ... SCAG anticipates nominal Plan impact..."
0001777.178	<p>#178 Clarification, p. 194; column 3; line 1</p> <p>“The forecasted growth patterns included in the Plan reduced risks for [insert] non-Hispanic [end insert] Asian households in earthquake zones, nominal changes to existing exposures to sea level rise, wildfires, extreme heat, drought and earthquake hazards. Although impacts from climate-related hazards are not always geographically isolated, overall [insert] non-Hispanic [end insert] White populations reside disproportionately in climate hazard zones.”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.164.

ID	COMMENT	RESPONSE
0001777.179	<p>#179 Clarification, p. 194; column 3; line 3</p> <p>"...In 2050, [insert] non-Hispanic [end insert] Asian and foreign-born populations are expected to grow in freeway-adjacent areas, though there are no significant differences with the Plan. Emissions reductions in freeway-adjacent areas are significant compared to the share of the region's total land area, but the Plan impact is still expected to be more pronounced in the region, compared to the freeway-adjacent areas, including areas that overlap with Priority Development Areas. [insert] Non-Hispanic [end insert] Black..."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.164.
0001777.180	<p>#180 Correction, p. 195 [Mobility Technical Report]</p> <p>Map 4-1. The Toll Roads in Orange County are not Interstate Highways, suggest adding a Toll Roads category or code as Other Freeway</p>	SCAG is updating the map to correct Caltrans Functional Classification details.
0001777.181	<p>#181 Clarification, p. 195; column 3; line 1</p> <p>"Increased air passenger demand itself has not resulted in increased aviation noise exposure, as increased air passenger activity but reduced aircraft operations have resulted in reduced aircraft noise."</p> <ul style="list-style-type: none"> • Sentence is incomplete; please reword 	Table 1, column 3, aviation noise impacts measure is revised from "... aviation noise exposure, as increased air passenger activity but reduced aircraft operations have resulted in reduced aircraft noise." to "... aviation noise exposure. Rather, the increased air passenger activity paired with reduced aircraft operations due to larger planes has resulted in reduced aircraft noise."
0001777.182	<p>#182 Clarification, p. 195; column 3; line 4</p> <p>"The Plan is expected to invest a greater proportion into projects that benefit the lowest income quintile, and [insert] non-Hispanic [end insert] White, [insert] non-Hispanic [end insert] Black and people who identify as another race (i.e., [insert] non-Hispanic [end insert] Native American, [insert] non-Hispanic [end insert] Native Hawaiian/Pacific Islander, some other [insert] non-Hispanic [end insert] race alone, and two or more [insert] non-Hispanic [end insert] races) compared to other income quintiles and Hispanic/Latino and non-Hispanic Asian populations."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.164.
0001777.183	<p>#183 Clarification, p. 196; column 3; line 1</p> <p>"... Taxes that help fund projects in the Plan are expected to fall more heavily on [insert] non-Hispanic [end insert] White and [insert] non-Hispanic [end insert] Asian households."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.164.
0001777.184	<p>#184 Clarification, p. 197; column 1; sentence 4</p> <p>"...Connect SoCal 2024 investments by race and ethnicity are more complicated; the Plan is expected to spend more on projects that [insert] non-Hispanic [end insert] White and [insert] non-Hispanic [end insert] Black people are more likely to use compared to Hispanic/Latino and [insert] non-Hispanic [end insert] Asian travelers."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	See response to comment 0001777.164.

ID	COMMENT	RESPONSE
0001777.185	<p>#185 Clarification, p. 199; column 2 "Active Transportation [insert](AT) [end insert]- ..."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	The acronym is added to the definition.
0001777.186	<p>#186 Clarification, p. 200; column 1 "ADU – Accessory Dwelling Unit – A [insert] space, [end insert] room or set of rooms in a [insert] residential unit [end insert] [strikeout] singlefamily home (and in a single-family zone) [end strikeout] that has been designated or configured to be used as a separate dwelling unit and has been established by a permit."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	Definition of ADU- Accessory Dwelling Unit changed to " A secondary dwelling unit with complete independent living facilities for one or more persons that is separated from a primary residential structure, attached to a primary residential structure, or space within a primary residence that is converted into an independent living unit."
0001777.187	<p>#187 General comment, p. 201 [Mobility Technical Report] The Regional Express Lanes Network discussion should be expanded to include HOT lanes and Toll Roads. Orange County Toll Roads are not categorized as express or HOT lanes, but collect tolls as a means of insuring low-emission, free-flow capacity and funding the construction and operation of the facility. TCA-operated Toll roads integrate with express lane and HOT lane facilities via the common FasTrak technology that allows inter-operability and convenience for drivers</p>	<p>Comment noted. Since the tolls collected on the TCA-operated Toll Roads in Orange County are exclusively to pay debt service for construction of the facilities and do not provide incentives for carpooling, it would not be appropriate to include them directly in a discussion with express/HOT lanes without further explanation. Additionally, it should be clarified that the Toll Roads are owned and maintained by Caltrans.</p> <p>FasTrak® is the branding used for electronic tolling collection systems throughout California and provides interoperability throughout California. The FasTrak® brand name and logo are registered trademarks of TCA. Connect SoCal is updated to note the interoperability between the toll roads and the regional express lanes network.</p>
0001777.188	<p>#188 Clarification, p. 202; column 1 "CARB – California Air Resources Board [insert](ARB)[end insert] – California state..."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	The California Air Resources Board uses the acronym CARB. Connect SoCal 2024 is updated to only use CARB as the acronym throughout the Plan and Technical Reports.
0001777.189	<p>#189 Clarification, p. 202; column 2 "CEHD – ... This committee reviews projects, plans and programs of regional significance for consistency and conformity with applicable regional plans." • The CEHD is responsible for reviewing projects, plans and programs of regional significance for consistency and conformity with applicable regional plans? Is this the responsibility of the TCWG?</p>	This definition of SCAG's Community, Economic and Human Development Committee (CEHD) is consistent with SCAG's bylaws, updated May 5, 2022.
0001777.190	<p>#190 Clarification, p. 204; column 1 Add criteria pollutants</p>	"Criteria pollutants" is added to the glossary.
0001777.191	<p>#191 Clarification, p. 204; column 2 Add EEC</p>	SCAG's Energy and Environment Committee is added to the glossary.

ID	COMMENT	RESPONSE
0001777.192	<p>#192 Clarification, p. 206; column 2</p> <p>"GIS – Geographic Information System – Mapping software that links information about where things are with information about what things are like. GIS allows users to examine relationships between features. [insert]These include those[end insert] distributed unevenly over space, seeking patterns that may not be apparent without using advanced techniques of query, selection,analysis [sic] and display."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	The text is updated.
0001777.193	<p>#193 Clarification, p. 206; column 2</p> <p>"Greenfield – Also known as "raw land," land that is privately owned, lacks urban services, has not been previously developed, and is located at the fringe of existing urban areas."</p> <ul style="list-style-type: none"> • "and is located at the fringe" or should it be "[insert] or [end insert] [strikeout] and [end strikeout] is located at the fringe"? • Add where the definition comes from. • Could this be publicly owned? <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	The definition of "greenfield" land is available in the Connect SoCal 2024 Glossary: " Also known as "raw land," land that is privately owned, lacks urban services, has not been previously developed, and is located at the fringe of existing urban areas."
0001777.194	<p>#194 Clarification, p. 207; column 1</p> <p>"GRRRA – Green Region Resource Areas – Derived from SB 375 statute and Connect SoCal 2020 strategies, GRRAs highlight where future growth is not encouraged [insert] by SCAG [end insert] due to presence of open space, habitats, farmland, and/or sensitivity to natural hazards and a changing climate."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	The sentence has been updated to include "by SCAG" where indicated.
0001777.195	<p>#195 Clarification, p. 207; column 1</p> <p>"Habitat Connectivity – The [insert] extent [end insert] [strikeout] degree [end strikeout] to which the landscape facilitates animal movement and other ecological flows."</p> <ul style="list-style-type: none"> • Add where the definition comes from. 	Comment noted. The source of the definition is from the Federal Highway Administration's (FHWA) Wildlife Crossing Structural Handbook, which can be found at: https://www.fhwa.dot.gov/clas/ctip/wildlife_crossing_structures/default.aspx#toc .
0001777.196	<p>#196 Clarification, p. 207; column 2</p> <p>"Household – A household is a [insert] housing unit that is occupied by people and [end insert] consists of all the people who occupy [insert] the [end insert][strikeout] a [end strikeout] housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit, such as partners or roomers, is also counted as a household."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	Comment noted. Change not recommended.
0001777.197	<p>#197 Clarification, p. 208; column 1</p> <p>"IGR – Intergovernmental Review Process – The review of documents by several governmental agencies to [insert] consider [end insert][strikeout] ensure [end strikeout] consistency of regionally significant local plans, projects and programs with SCAG's adopted regional plans."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	Comment noted. The Glossary language for IGR is changed to read, "Intergovernmental Review Process – The review of documents by several governmental agencies to facilitate consistency of regionally significant local plans, projects and programs with SCAG's adopted regional plans."

ID	COMMENT	RESPONSE
0001777.198	<p>#198 Clarification, p. 209; column 1 [insert] LAFCO [end insert][strikeout] LAFCo [end strikeout]– Local Agency Formation Commission – Regional service planning agencies of the State of California that exercise regulatory and planning powers. [insert] LAFCO [end insert][strikeout] LAFCo [end strikeout]s regulatory powers are outlined in California Government Code Sections 56375 and 56133.</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	This edit was applied.
0001777.199	<p>#199 Clarification, p. 209; column 1 “Livable Communities [insert] (LC) [end insert] – Any...”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	Comment noted. We will insert "(LC)" into the supplemental glossary for Livable Corridors.
0001777.200	<p>#200 Clarification, p. 209; column 2 “Livable Corridors [insert] (LC) [end insert] – Livable...”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	Comment noted. (LC) will be added after "Livable Corridors" and before " - Livable..." in the supplemental document.
0001777.201	<p>#201 Clarification, p. 209; column 2 “MAP-21 – Moving Ahead for Progress in the 21st Century – Signed into law by President Obama on July 6, 2012. Funding surface transportation programs at over \$105 billion for fiscal years [insert]ending in [end insert] (FY) 2013 and 2014, MAP-21 was the first long-term highway authorization enacted since 2005.”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	Comment noted. This change was not applied to remain consistent with the language at https://www.fhwa.dot.gov/map21/ .
0001777.202	<p>#202 Correction, p. 210; column 1 “Measure A – Revenues generated from Riverside County’s local half-[insert]percent[end insert] [strikeout]cent[end strikeout] sales tax. Measure D – Revenues generated from Imperial County’s local half- [insert]percent[end insert] [strikeout]cent[end strikeout] sales tax. Measure I – Revenues generated from San Bernardino County’s local half-[insert]percent[end insert][strikeout]cent[end strikeout] sales tax. Measure M – Revenues generated from Orange County’s local half- [insert]percent[end insert] [strikeout]cent[end strikeout] sales tax. Also refers to Los Angeles County’s local, half-[insert]percent[end insert][strikeout]cent[end strikeout] sales tax which was authorized in 2018. Measure R – Revenues generated from Los Angeles County’s local half- [insert]percent[end insert] [strikeout]cent[end strikeout] sales tax.”</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	This is an error and is updated to read percent instead of cent for all transportation sales tax measures.

ID	COMMENT	RESPONSE
0001777.203	<p>#203 Clarification, p. 211; column 1</p> <p>"Multifamily Residential – [insert]</p> <p>For the purposes of the RTP/SCS, the category of "multi-family" residential units include townhomes, which are defined by the State of California Department of Finance and the U.S. Census Bureau as single-family homes. The category Connect SoCal refers to as 'multi-family' [end insert] units are attached residences, [insert]including[end insert] apartments, condominiums and townhouses. Multifamily residences are usually served by all utilities, are on paved streets, and are provided with or have access to all urban facilities such as schools, parks, and police and fire stations. Senior citizen apartment buildings are included in these classes. Also included are off-campus university-owned housing and off-campus fraternity/sorority houses."</p> <ul style="list-style-type: none"> • Townhomes are single-family homes as defined by the State of California DOF and the U.S. Census Bureau. <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Definition of Multi-famil Residential language changed to : "Multifamily Residential – For the purposes of the RTP/SCS, the category of "multi-family" residential units include townhomes, which are defined by the State of California Department of Finance and the U.S. Census Bureau as single-family homes. The category Connect SoCal refers to as 'multi-family' units are attached residences, including apartments, condominiums and townhouses. Multifamily residences are usually served by all utilities, are on paved streets, and are provided with or have access to all urban facilities such as schools, parks, and police and fire stations. Senior citizen apartment buildings are included in these classes. Also included are off-campus university-owned housing and off-campus fraternity/sorority houses."</p>
0001777.204	<p>#204 Clarification, p. 211; column 1</p> <p>"Natural Lands – Biologically diverse landscapes, such as forested and mountainous areas, shrub lands, deserts and other ecosystems, that contain habitat that supports wildlife and vegetation."</p> <ul style="list-style-type: none"> • Add where the definition comes from. 	<p>Comment noted. The definition in the glossary has been updated to be consistent with California Public Resources Code.</p>
0001777.205	<p>#205 Clarification, p. 211; column 2</p> <p>"NIMBY – Not in My Backyard – The phenomenon where people oppose the location of a development perceived as undesirable (e.g., [insert]housing,[end insert] landfill, freeway expansion) in their own neighborhood, [insert]and often[end insert] [strikeout]but[end strikeout] raise no objections of similar developments elsewhere."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>Definition of NIMBY -- Not in My Backyard changed to "The phenomenon where people oppose the location of a development perceived as undesirable (e.g., housing, landfill, freeway expansion) in their own neighborhood, but do not raise objections of similar developments elsewhere."</p>
0001777.206	<p>#206 Clarification, p. 213; column 1</p> <p>"PEC – Priority Equity Communities – (Formerly Environmental Justice Areas, Disadvantaged Communities and Communities of Concern) Census tracts in the SCAG region with a greater concentration of populations that have been historically marginalized and are susceptible to inequitable outcomes based on several socioeconomic factors. *For more information, see the Equity Analysis Technical Report."</p> <ul style="list-style-type: none"> • Define historically marginalized • Define socioeconomic factors • List source of the definition 	<p>See response to comment 0001777.159 concerning the definition of "historically marginalized." Socioeconomic factors used to develop Priority Equity Communities are defined in Section 4.2.1 of the Equity Analysis Technical Report. SCAG developed the definitions for Priority Equity Communities with community input as described in Section 4.1 of the Equity Analysis Technical Report.</p>
0001777.207	<p>#207 Clarification, p. 214; column 1</p> <p>"Proposition 1A – Passed by [insert]California[end insert] voters in 2006, Proposition 1A..."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	<p>The definition is updated to clarify that this proposition was passed by California voters.</p>
0001777.208	<p>#208 Correction, p. 214; column 2</p> <p>"Proposition A – Revenues generated from Los Angeles County's local half-[insert]percent[end insert][strikeout]cent[end strikeout] sales tax. Los Angeles County has three permanent local sales taxes (Propositions A and C, and Measure M) and one temporary local sales tax (Measure R). Proposition C – Revenues generated from Los Angeles County's local half-[insert]percent[end insert][strikeout]cent[end strikeout] sales tax. Los Angeles County has three permanent local sales taxes (Propositions A and C, and Measure M) and one temporary local sales tax (Measure R)."</p>	<p>This is an error and is updated to read percent instead of cent for all transportation sales tax measures.</p>

ID	COMMENT	RESPONSE
0001777.209	<p>#209 Clarification, p. 218; column 2</p> <p>"Small-Lot Development – A practice that allows for the subdivision of lots located within existing multifamily and commercial zones to develop fee-simple housing. Typically, small lot developments are not required to be part of a homeowner’s association, thus reducing the cost for home buyers."</p> <ul style="list-style-type: none"> • What is "fee-simple housing"? 	Definition of Small-Lot Development removed.
0001777.210	<p>#210 Clarification, p. 219; column 1</p> <p>"Sustainable Development – Sustainable development [italics]can support the region to thrive with essential[end italics] resources that maintain quality of life and a growing economy in the present, such as water, energy and food supply, while also enabling future generations to thrive amidst both forecasted and unforeseen challenges."</p> <ul style="list-style-type: none"> • Reword beginning of sentence (italics) to provide clarity; are the "essential resources" water, energy, food supply? 	"Sustainable development can support the region to thrive with essential resources that maintain quality of life and a growing economy in the present, such as water, energy and food supply, while also enabling future generations to thrive amidst both forecasted and unforeseen challenges" is changed to read "Sustainable development supports quality of life and economic growth for the region's present and future populations through ensuring that essential resources, such as water, energy, and food supply, are responsibly managed. This enables current and future generations to thrive amidst both forecasted and unforeseen challenges."
0001777.211	<p>#211 Clarification, p. 219; column 2</p> <p>"TC – Transportation Committee – [insert]SCAG Policy[end insert] Committee used to study problems, programs and other matters that pertain to the regional issues of mobility, air quality, transportation control measures and communications."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	"SCAG" is added to the Transportation Committee definition.
0001777.212	<p>#212 Clarification, p. 220; column 2</p> <p>"Transportation Equity Zones [insert](TEZs)[end insert] – Communities across the SCAG region most impacted by transportation-related inequities"</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	The acronym is added to the definition.
0001777.213	<p>#213 General Comment, p. 221</p> <p>Congestion pricing discussion should include Toll roads and express/HOT lane networks that charge users a fee for travel, but typically offer less congested traffic lanes than nearby freeways and roadways. Reduced congestion provides improved and more efficient mobility with fewer air pollutants and GHG emissions caused by congestion.</p>	Comment noted. Since the tolls collected on the TCA-operated Toll Roads in Orange County are exclusively to pay debt service for construction of the facilities and do not provide incentives for carpooling, it would not be appropriate to include them directly in a discussion with express/HOT lanes without further explanation. Connect SoCal is updated to note the interoperability between the toll roads and the regional express lanes network.
0001777.214	<p>#214 Clarification, p. 221; column 1</p> <p>"Universal Basic Mobility [insert](UBM)[end insert] – Programs that provide qualified residents with subsidies for transit and other mobility services.</p> <p>Urban Areas [insert](UZA)[end insert] – Urban Areas in the SCAG region represent densely developed territory and encompass residential, commercial and other nonresidential urban land uses where population is concentrated over 2,500 people in a given locale."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	These acronyms are added to the definitions.
0001777.215	<p>#215 Clarification, p. 222; column 1</p> <p>"Vehicle Revenue Hours – The hours that a public transportation vehicle actually travels while in revenue service. Vehicle revenue hours include layover/recovery time, but exclude deadheading [insert](vehicles not in service and driving without passengers)[end insert], operator training, vehicle maintenance testing, and school bus and charter services."</p> <p>[See Table 1. 2024 RTP/CONNECT SOCIAL COMMENTS AND GENERAL COMMENTS in attachment for denoted edits.]</p>	SCAG is revising the text to read: "The hours that a public transportation vehicle actually travels while in revenue service. Vehicle revenue hours include layover/recovery time, but exclude deadheading (vehicles not in service and driving without passengers), operator training, vehicle maintenance testing, and school bus and charter services."
0001777.216	<p>#216 Clarification, p. 227; column 2; last paragraph; last sentence</p> <p>"Staff gathered input from residents primarily via a survey that provided contextual and educational information. [insert]The outreach activities include:[end insert]"</p>	Comment noted. The suggested edit is applied.

ID	COMMENT	RESPONSE
0001777.217	<p>#217 Clarification, p. 227; column 2 "Public survey: 3,600+ responses"</p> <ul style="list-style-type: none"> • Please clarify if this is the number of respondents or number of questions answered by respondent providing answer. It is misleading if the answer is the latter and should be clarified. 	<p>Comment noted. The text is updated to clarify that the "3,600 survey responses" refers to the total of unique survey forms submitted by respondents.</p>
Submitted by	Orange County Council of Governments	Submittal 0001778
0001778.001	<p>Table 2: PEIR Comments</p> <p>#1 General Comment, All pages</p> <p>General: For an EIR document, is it appropriate to use first-person references (e.g., "our expansive goods movement" or "our region"), or should an EIR, as an information document, exclude such first-person references and use "the SCAG region" or something similar?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.002	<p>#2 General Comment, PEIR</p> <p>GHG Emission Reduction Target: The Draft EIR makes reference throughout the document of the SCAG GHG emission reduction target being "19% below 2005 levels by 2035." Should these references identify that this is a per capita reduction target, to eliminate any potential misunderstanding of the 19% 2035 reduction target equaling the 2005 GHG emissions at the regional level, minus 15% of that regional total level?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.003	<p>#3, General Comment, All Pages</p> <p>Many of the source citations in the GHG Emissions chapter cite sources dated from 2007, 2016 and 2017. What is the protocol for the using up-to- date source references? Are these from prior documents and perhaps need to be updated? Or were they used because the analysis and source material were to relate to the Plan's 2019 Existing Conditions base year?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.004	<p>#4, General Comment, PEIR</p> <p>GHG Emission Reduction Target: The Draft EIR makes reference throughout the document of the SCAG GHG emission reduction target being "19% below 2005 levels by 2035." Should these references identify that this is a per capita reduction target, to eliminate any potential misunderstanding of the 19% 2035 reduction target equaling the 2005 GHG emissions at the regional level, minus 15% of that regional total level?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.005	<p>#5 General Comment, All Maps</p> <p>All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001778.006	<p>#6 General Comment, All Pages; Tables; figures</p> <p>Black font on teal background is difficult to read in tables and figures</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.007	<p>#7, General Comment, All Tables</p> <p>Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.008	<p>#8, General Comment, ES-4; bullet 3</p> <p>“Orange County. Orange County covers an area of 799948 square miles. Anaheim is the city with the highest population level in the county, with approximately 347,000 people in 2019. Overall, the county had 3,191,000 residents that year.” County of Orange Surveyor/Public Works’ official information is that OC covers ~799 square miles. This does not include city boundaries that extend approximately 3 miles off the coastline, which is included by the U.S. Census Bureau from which the 948 estimate is cited.</p> <ul style="list-style-type: none"> • Update land totals for Ventura and Los Angeles Counties to remove the ocean census tract area if U.S. Census Bureau geographic information was used 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.009	<p>#9. Transportation Network, ES-5</p> <p>The inventory of the bus routes mileage on page ES-5 warrants some clarification.</p> <p>Clarify whether the total miles of bus routes includes or excludes the separately listed bullet of express bus lanes miles. Specifically, is the 2,302 miles of express bus lanes a subset of the 33,485 miles of total bus routes listed, or a separate and additive inventory.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.010	<p>#10, Land uses, ES-5</p> <p>Incorrect, interchangeable use of “households” versus “housing units”. Please see revised wording below.</p> <p>“The SCAG region is comprised of complex patterns of land uses including residential, commercial/office, industrial, institutional, agricultural, and open space land uses. The region has incredible diversity in its built environment and land use patterns (see Map ES-4, Existing Land Use, below). As of 2019, the SCAG region has a total of approximately 6.2 ^{6.5} million ^{housing units} households in its housing stock, with over half of the ^{housing units} households having been built before 1980. While 54 percent are single- family homes, 46 percent are ^{attached} attached ^{multifamily} multifamily homes—^{generically referred to as multi-family units for the purposes of Connect SoCal}—such as condominiums, townhouses, and apartments. ^{There are about 6.2 million households in the SCAG region (occupied housing units). ...}”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.011	<p>#11, Clarification, ES-6; paragraph 2; sentence 1</p> <p>"The Plan was also developed to achieve state targets for greenhouse gas (GHG) emissions reductions..."</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.012	<p>#12 Clarification, ES-7; footnote; sentence 4</p> <p>"SCAG used its best efforts to incorporate the RHNA, but the data is inherently incomplete because only 12 of 197 jurisdictions had certified housing elements [insert]in May 2022[insert end], and some local jurisdictions may not be required to complete rezoning associated with housing elements until October 2024."</p> <ul style="list-style-type: none"> • Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.013	<p>#13 Financial Plan, ES-11; 2-30</p> <p>EIR states that "Transit-related costs comprise the largest share of O&M costs for the region, totaling approximately \$250 billion."</p> <p>(1) Please refer the reader to the applicable table (Table 2-5, pp. 2-30 and 2-31).</p> <p>(2) Does "transit" include both bus and rail transit? Also, does transit include "passenger rail"?</p> <p>(3) Table 2-5, page 2-31, identifies Transit O&M as \$244.5 billion, in contrast to the \$250 billion cited on page ES-11. Please review and correct.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.014	<p>#14, Alternative 1: No Project Transportation Network. ES-12 4-9</p> <p>Page ES-12 of the EIR states that the Alternative 1: the No Project Alternative includes the first two years of transportation projects in the previously- conforming RTP or FTIP. Other sections of the EIR (e.g., page 4-9) reference that Alternative 1 includes the first year of programmed transportation projects. Review and confirm and make consistent in the EIR document: is it one or two years of transportation programming that is included in Alternative 1?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.015	<p>#15 Correction, ES-13; paragraph 2; sentence 1</p> <p>"As discussed in Chapter 4, Alternatives, the summary comparison for the No Project Alternative, Intensified Land Use Alternative, and the Plan is presented in [strikethrough] Error! Reference source not found.[strikethrough end] 7, Comparison of Significant Adverse Environmental Impacts for Connect"</p> <ul style="list-style-type: none"> • Insert missing information 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.016	<p>#16, Clarification, ES-15; paragraph 2</p> <p>Provide a clear statement here to the following effect: All mitigation measure recommendations to project sponsors and agencies are advisory. Lead agencies are responsible for identifying and addressing those measures they deem practical and feasible, or applicable to specific projects. This would remove the need to start every project level mitigation by stating, "Project- level mitigation measures can and should be considered by lead agencies as applicable and feasible."</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.017	<p>#17 Mitigation Measures; Project Level; ES-18 to ES-77</p> <p>The project level mitigation measures use various terminology to allow the Lead Agency to determine if EIR mitigation measures are applicable and reasonable for a project. Phrases used in the EIR include:</p> <ul style="list-style-type: none"> • "as applicable and feasible" • "to the maximum extent practicable" * "wherever practicable and feasible" * "wherever feasible" <p>a) Make the reference consistent in phrasing across all project-level mitigation measures. b) Apply said phrasing to all the project-level mitigation measures.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.018	<p>#18, Mitigation Measures: Project Level, ES-18 to ES-77</p> <p>Many of the mitigation measures seem to reference policies, procedures, best practices, and documents from other agencies (e.g., Caltrans, air districts, etc.).</p> <p>a) When referencing other agency documents (such as PMM-AQ-1(i) that references Caltrans' Standard Specifications 10-Dust Control, 17-Watering and 18: Dust Palliative), is it better to just reference that a project should consider applicable Caltrans and other agency specifications, rather than detailing the specific reference documents, which may be amended over time and the references could have the potential to be outdated over the four years of the RTP/SCS Plan?</p> <p>b) Many of the mitigation measures contain an extensive inventory of "best practices" from other agencies. Where does one establish a line as to what constitutes a "best practice" versus a "mitigation measure"? Would many of these other agency "best practices" that are inventoried in the mitigation measures, be duplicative of comments that are received by the Lead Agency from said agencies, as part of an environmental review process of a specific project, or in conjunction with applying for a permit? What is the appropriate level of detail of other agency requirements that should be listed in the EIR, especially as mitigation measures?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.019	<p>#19 Mitigation Measures: PMM-AES-1 ES-18</p> <p>To address aesthetic impacts, MM PMM-AES-1 (c) includes language that the Lead Agency "Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas."</p> <p>How would this emphasis on maintaining consistency with the surrounding area's dominant landscaping, conflict with efforts to support drought tolerant landscaping? There are other efforts already being conducted by local jurisdictions and county transportation commissions, which fund the removal of non-drought tolerant landscaping and replace it with drought tolerant landscaping as well as water conserving irrigation systems. How should the mitigation measure be amended, to best address potentially conflicting objectives between aesthetics and drought-tolerance?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.020	<p>#20 Mitigation Measures, ES-19</p> <p>To address existing visual character and public views, MM PMM-AES-2 references Lead Agency measures such as developing design guidelines for projects, to make elements of proposed buildings and facilities visually compatible or to minimize the visibility of changes.</p> <p>While one recognizes that the proposed mitigation measure does emphasize that the application of the Mitigation Measure is as applicable and feasible by the Lead Agency, there lacks a sensitivity or recognition that for some residential projects, the looks, mass, height and general character of ministerial and by-right projects will not be negotiable between a Lead Agency and a project developer.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.021	<p>#21 Mitigation Measures. ES-21</p> <p>To address farmland preservation, MM SMM-AG-3 references SCAG's development of the Greenprint web-based tool.</p> <p>a) The mitigation measure should identify that the Greenprint Tool is an elective tool for local jurisdictions and county transportation commissions. b) As referenced in the mitigation measure, is "scenario visualization" a component of the Greenprint Tool, with the current recommended directive that the Tool start small? c) Propose that the mitigation measure language be revised as follows: "... to support local jurisdictions and transportation agencies make better informed land use and transportation infrastructure decisions....".</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.022	<p>#22 Clarification, Table ES-3; ES-24</p> <p>"PMM-AQ-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, [insert] where applicable and feasible [insert]. Such measures may include the following or other comparable measures identified by the lead agency:"</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.023	<p>#23, Mitigation Measures: PMM-AQ-1: Enhanced Filtration Units, ES-26, ES-27</p> <p>Mitigation Measure PMM-AQ-1(z) includes an extensive inventory of enhanced air filters monitoring, inspection and maintenance program, for projects located with 500 feet of freeways and other sources. The last element of the program requires the Lead Agency to "Develop a process for evaluating the effectiveness of the enhanced filtration units."</p> <p>This last element seems to bring into question whether the enhanced air filters are effective, while nonetheless recommending a series of actions relating to their installation. Please clarify and appropriately re-word.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.024	<p>#24, Mitigation Measures: PMM-AQ-1: Title 24 Building Code. ES-28</p> <p>Mitigation Measure PMM-AQ-1(cc) states that a Lead Agency "Promote energy efficiency andexceed] Title-24 Building Code Envelope Energy Efficiency Standards (California Building Standards Code).</p> <p>Clarify the appropriateness of a mitigation measure that seeks a Lead Agency to ask for exceeding state code requirements.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.025	<p>#25 Mitigation Measures: PMM-AQ-1: Construction Period; ES-29</p> <p>Mitigation Measure PMM-AQ-1(ee) states that a Lead Agency should consider whether to "Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time."</p> <p>Is this a recommended practice that is currently in place? Please clarify how the construction period would be lengthened? Is this to extend the construction period (e.g. hours) during the day, or how many the number of days of the week when construction could occur, or to ask a developer to take a longer amount of time to develop the project? Is this a realistic ask?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.026	<p>#26 Mitigation Measures: PMM-AQ-1: Construction Period ES-29</p> <p>Mitigation Measure PMM-AQ-1(ee) states that a Lead Agency should consider whether to "Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time."</p> <p>Is this a recommended practice that is currently in place? Please clarify how the construction period would be lengthened? Is this to extend the construction period (e.g. hours) during the day, or how many days of the week when construction could occur, or to ask a developer to take a longer amount of time to develop the project? Is this a realistic ask?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.027	<p>#27 Clarification, Table ES-3; ES-30</p> <p>"PMM-AQ-2 For projects subject to California Environmental Quality Act (CEQA) review (i.e., non-exempt projects) and located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and within one-quarter mile (1,320 feet) of a sensitive land use, project leads, as applicable and feasible, should prepare an air quality analysis that evaluates potential localized project air quality impacts in conformance with SCAQMD methodology for assessing localized significance thresholds (LST) air quality impacts. If air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the project shall incorporate feasible mitigation measures to reduce air pollutant emissions."</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.028	<p>#28 Clarification, Table ES-3; ES-30-31</p> <p>"PMM-BIO-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, and species that meet the definition of "rare" as defined in CEQA Guidelines Section 15380(b)(2), where applicable and feasible."</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.029	<p>#29 Clarification Table ES-3; ES-32,</p> <p>"PMM-BIO-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, where applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:"</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.030	<p>#30 Mitigation Measures: PMM-BIO-3: In-lieu fees vs in kind services, ES-34</p> <p>Mitigation Measure PMM-BIO-3() states that wetlands compensatory mitigation can include "Contribution of in-kind in-lieu fees."</p> <p>Is this an error and perhaps should read "Contribution of in-kind services or in-lieu fees"? In-kind typically refers to the payment of goods or services, as opposed to monies.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.031	<p>#31 Clarification, Table ES-3; ES-34</p> <p>"PMM-BIO-3 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, [insert] where applicable and feasible [insert end]."</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.032	<p>#32 Clarification Table ES-3; ES-35</p> <p>"PMM-BIO-4 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, where [insert] where applicable and feasible [insert end]"</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.033	<p>#33, Mitigation Measures PMM-BIO-4: Open space/nursery site areas, ES-37</p> <p>Mitigation Measure PMM-BIO-4(p) identifies that where an RTP/SCS or other regionally significant project has the "potential to impact other open space or nursery site areas," that compensatory coverage should be sought.</p> <p>The mitigation measure should clarify what is "other open space". Also, the reference to "nursery site areas" should be expanded to reference what type of nursery site area is governed by this mitigation measure. All plant nurseries, including commercial nurseries? And how would this address wildlife movement, which is the emphasis of the mitigation measure?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.034	<p>#34, Mitigation Measures PMM-BIO-4: Corridor Redundancy, ES-38</p> <p>Mitigation Measure PMM-BIO-4(v) identifies that one comparable measure to address wildlife movement impacts, is to "Create corridor redundancy to help retain functional connectivity and resilience."</p> <p>The mitigation measure should include clarification on exactly what type of corridor redundancy is being recommended, to avoid confusion between a transportation corridor versus a wildlife or other corridor that the mitigation measure is addressing.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.035	<p>#35 Clarification Table ES-3; ES-38</p> <p>"PMM-BIO-5 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, [insert] where applicable and feasible." [insert end]</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.036	<p data-bbox="205 94 1129 115">#36 Mitigation Measures: PMM-BIO-4: Tree Removal Timing, ES-39</p> <p data-bbox="205 152 1129 206">Mitigation Measure PMM-BIO-5(h) identifies that debris to be removed as a result of tree removal work should be done within two weeks of debris creation.</p> <p data-bbox="205 233 1129 289">Recommend that the timing also include the phrase "or as determined by the local jurisdiction", to allow for compliance with any local agency requirements or timing needs.</p>	<p data-bbox="1136 94 2066 206">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.037	<p data-bbox="205 305 1129 326">#37 Clarification, Table ES-3; ES-40</p> <p data-bbox="205 358 1129 467">"PMM-BIO-6 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, [insert] where applicable and feasible." [insert end]</p>	<p data-bbox="1136 305 2066 417">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.038	<p data-bbox="205 516 1129 537">#38 Clarification Table ES-3; ES-40</p> <p data-bbox="205 570 1129 678">"PMM-CUL-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, [insert] where applicable and feasible." [insert end]</p>	<p data-bbox="1136 516 2066 628">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.039	<p data-bbox="205 727 1129 748">#39, Clarification Table ES-3; ES-40</p> <p data-bbox="205 781 1129 889">"PMM-CUL-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, [insert] where applicable and feasible." [insert end]</p>	<p data-bbox="1136 727 2066 839">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.040	<p data-bbox="205 963 1129 984">#40 Clarification, Table ES-3; ES-44</p> <p data-bbox="205 1016 1129 1206">"PMM-GEO-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider, [insert] where applicable and feasible." [insert end], mitigation measures to minimize the potential for adverse effects associated with surface fault rupture, seismic ground shaking, seismic-related ground failure, liquefaction, and landslides for projects located on sites with unusual geologic conditions, the following measures [insert] should [insert], [strikethrough] shall [strikethrough] end] be considered:"</p>	<p data-bbox="1136 963 2066 1075">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.041	<p data-bbox="205 1222 1129 1243">#41 Clarification, Table ES-3; ES-45</p> <p data-bbox="205 1281 1129 1385">"PMM-GEO-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to geological impacts, [insert] where applicable and feasible." [insert end]</p>	<p data-bbox="1136 1222 2066 1334">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001778.042	<p>#42 Clarification</p> <p>“PMM-GEO-3 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources, [insert] where applicable and feasible.”[insert end]</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.043	<p>#43 Clarification, Table ES-3; ES-47</p> <p>“PMM-GHG-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, [insert] where applicable and feasible.”[insert end]</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.044	<p>#44 Mitigation Measures: PMM-GHG-1: EV ES-48 ES-49</p> <p>To promote GHG reduction, Mitigation Measure PMM-GHG-1(a)(ix), 1(j)iv and (l) promote electric vehicle infrastructure.</p> <p>Is the draft EIR solely promoting electric vehicle infrastructure, or should these references also include other alternative-fueled infrastructure, such as hydrogen? Also please see other minor comments on MM PMM-GHG-1 in the attached scanned document.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.045	<p>#45 Mitigation Measures: SMM-LU-1: Siting New Facilities ES-60</p> <p>Mitigation Measure SMM-LU-1 requires SCAG to work with agencies and jurisdictions "when siting new facilities in residential areas...".</p> <p>Does this reference apply to new facilities related to transportation, such as new roads and freeways? If so, please include this clarifier, to prevent any misunderstanding on the types of new facilities the mitigation is supposed to address.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.046	<p>#46 Clarification, Table ES-3; ES-60</p> <p>“PMM-HYD-4 ...Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. In areas affected by coastal flooding, new projects should be designed for resilience [insert] against [insert] with with 3.5 feet of sea-level rise, as per California Ocean Protection Council’s strategic guidance.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.047	<p>#47 Clarification Table ES-3; ES-64</p> <p>“PMM-NOI-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, [insert] where applicable and feasible.”[insert end]</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.048	<p>#48 Mitigation Measures PMM-POP-1, ES-66</p> <p>Impact PPO-2 identifies that proposed Mitigation Measure PMM-POP-1 is to address the displacement of existing people and housing. PMM-POP-1(a) also includes a reference to the impacts of businesses on transportation route alignments. Please clarify if this mitigation measure is to apply to both existing homes and businesses, and if so, make the project impact and mitigation measure consistent in applicability.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.049	<p>#49 Clarification, Table ES-3; ES-70</p> <p>“PMM-TRA-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts, [insert] where applicable and feasible [insert end]. Such measures may include the following or other comparable measures identified by the lead agency: <input type="checkbox"/> For future land use development projects, lead agencies [insert] should [insert] shall encourage the incorporation of transit, bicycle, pedestrian, and micro-mobility facilities, features, and services”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.050	<p>#50 Mitigation Measures: PMM-TRA-2 FHWA Document Reference. ES-71</p> <p>Mitigation Measure PMM-TRA-2 addresses the consideration of TDM strategies in land use and transportation projects and plans. Said mitigation measure references, as guidance, an FHWA 2012 desk reference. Is 2012 the most current iteration of the document, and if so, has the document been reviewed to determine if it is up-to-date and relevant, with current technologies, strategies and trends?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.051	<p>#51, Clarification, Table ES-3; ES-71</p> <p>“PMM-TRA-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts, [insert] where applicable and feasible.[insert end]”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.052	<p>#52 Clarification, Table ES-3; ES-71</p> <p>“PMM-TRA-3 [insert] A lead agency for a project should, where applicable and feasible, prepare [insert end] Prepare a sight distance analysis as needed for locations where sight lines could be impeded. The sight distance analysis to be prepared according to the jurisdiction’s applicable Municipal Code requirements and the Caltrans Highway Design Manual (HCM) standards and guidelines, and should recommend safety improvements as appropriate such as limited use areas (e.g., low-height landscaping), and on-street parking restrictions (e.g., red curb), and any turning restrictions (e.g., right-in/right- out.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.053	<p>#53 Clarification, Table ES-3; ES-72</p> <p>“PMM-TCR-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, [insert] where applicable and feasible.[insert end]”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.054	<p>#54 Clarification, Table ES-3; ES-73</p> <p>“PMM-UTIL-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: a) Reduce exterior consumptive uses of water in public areas, and [strikethrough] should [strikethrough end] promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.055	<p>#55 Mitigation Measures: PMM-UTIL-3, ES-75</p> <p>Mitigation Measure PMM-UTIL-3 focuses on the reduction of solid waste. There are several references about [bold] developing opportunities [bold end] to divert food waste from landfills. Perhaps there should be a reference to SB 1383, which is already law, and focus the emphasis on strengthening versus developing opportunities to divert food waste?</p> <ul style="list-style-type: none"> • Think about removing J or rewording ordinance encouragement 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.056	<p>#56 Clarification Map ES-1</p> <ul style="list-style-type: none"> • Add page number • Add label for Orange County 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.057	<p>#57 Clarification Map ES-2</p> <ul style="list-style-type: none"> • Add page number • Add label for Orange County • Change source to SCAG • Map ES-2 illustrates 16 subregions in the Legend, but page ES-4 states there are 15 subregions in SCAG. Please review and correct inconsistency. • The legend color used for Orange County and SANBAG is almost identical. Is there any opportunity to change the color choice, especially since Orange County and San Bernardino County share a border? 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.058	<p>#58 Regional Location ES-4; Map ES-2</p> <p>EIR states that "the SCAG region consists of 15 subregional entities...". However, the referenced Map ES-2 illustrates 16 subregions. Please review and make consistent.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001778.059	#59 Clarification Map ES-3 <ul style="list-style-type: none"> Add page number Reduce thickness of city boundary lines 	For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001778.060	#60 Clarification Map ES-4 <ul style="list-style-type: none"> Add page number Add year to title Add note specifying land use categories were standardized by SCAG. 	For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001778.061	#61 Clarification p. ES-92; Map ES-5 Add page number <ul style="list-style-type: none"> Add language to map and/or map page <p>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”</p>	For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001778.062	#62 Clarification Map ES-6 <ul style="list-style-type: none"> Add page number Add year to title Change legend’s “Freeway” to “Freeway/Toll Road” 	For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001778.063	#63 Map ES-7 <ul style="list-style-type: none"> Add page number 	For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001778.064	#64 Clarification p. 1-2; paragraph 3; sentence 6 <p>“...SCAG developed the LDX process to engage local [insert] jurisdictions[insert] [strikethrough] partners [strikethrough end] and get information needed to fulfill state planning requirements.”</p>	For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001778.065	#65 Correction p. 1-8; paragraph 3; sentence 2 <p>“... Drafting an EIR [...] necessarily involves some degree of forecasting (CEQA Guidelines Section 15144).”</p> <ul style="list-style-type: none"> Insert the missing reference information 	For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir

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0001778.066	<p>#66 Clarification p. 1-14; paragraph 2; sentence 1</p> <p>“In addition, the 2024 PEIR identifies project-level mitigation measures for lead agencies to consider which they “can and should” [insert] consider for adoption[insert end] [strikethrough] adopt [strikethrough end], as applicable and feasible, in subsequent project-specific design, CEQA review, and decision-making processes.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.067	<p>#67 Clarification p. 1-15; paragraph 2; sentence 5</p> <p>“The [insert] notices[insert end] [strikethrough]notice [strikethrough end] are published in English, Spanish, Korean, Chinese, and Vietnamese languages. The Draft Connect SoCal 2024 [insert] documents [insert end] are posted on the SCAG website and virtually distributed to libraries throughout the region, and physically distributed to libraries upon request.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.068	<p>#68 Clarification p. 1-18; Table 1-3</p> <p>Add horizontal lines between rows to make information easier to read</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.069	<p>#69 Clarification p. 2-6; paragraph 4; last sentence</p> <p>“Additionally, some local jurisdictions may not be required to complete rezonings associated with housing element updates until October 2024, rendering data on newly available sites inherently incomplete (or unavailable) for the purposes of Connect SoCal 2024.”</p> <ul style="list-style-type: none"> • Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.070	<p>#70 Clarification p. 2-7; paragraph 3; last sentence</p> <p>“As noted above, Connect SoCal 2024 utilized the LDX process to solicit land use and growth input directly from SCAG’s local jurisdictions, and the Plan is the first RTP/SCS prepared by SCAG that did not modify the [insert] requested [insert end] local data inputs [insert] of housing and employment. [insert end]”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.071	<p>#71 Correction p. 2-8; bullet 3</p> <p>“Orange County. Orange County covers an area of 799[strikethrough]948[strikethrough end] square miles. Anaheim is the city with the highest population level in the county, with approximately 347,000 people in 2019. Overall, the county had 3,191,000 residents that year.”</p> <ul style="list-style-type: none"> • County of Orange Surveyor/Public Works’ official information is that OC covers ~799 square miles from the coastline inland. This does not include city boundaries that extend approximately 3 miles off the coastline, which is included by the U.S. Census Bureau from which the 948 estimate is cited. Density calculations using 948 should be redone using the 799 square miles that does not include the ocean area. <p>Update land totals for Ventura and Los Angeles Counties to remove the ocean census tract area if U.S. Census Bureau geographic information was used</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.072	<p>#72 Clarification p. 2-8; Section 2.4.2; bullet 1</p> <p>“40 miles of heavy and light rail”</p> <ul style="list-style-type: none"> • There are only 40 miles of heavy & light rail in the region? 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.073	<p>#73 Clarification p. 2-9; paragraph 1; sentence 4</p> <p>“While 64 percent are single-family homes, 36 percent are multifamily homes such as condominiums, townhouses, and apartments.”</p> <ul style="list-style-type: none"> • Townhomes are single-family attached homes as defined by the State of California DOF and the U.S. Census Bureau. • Perhaps add language that says “For the purposes of the RTP/SCS, the category of “multi-family” is a short-hand reference for housing units other than single-family detached housing units. These include attached housing units, such as townhomes, which are single-family attached units; condominiums; and apartments.” 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.074	<p>#74 Clarification p. 2-9; paragraph 2; sentence 4-5</p> <p>“... Much of the open space in the region has been left in its natural state, however many non-native species have transformed what was once native habitat. As of 2018, about half of California has been mapped and classified according to this standard; much of southern California has not yet been classified (CDFW 2023).”</p> <ul style="list-style-type: none"> • Clarify “this standard” 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.075	<p>#75 Clarification p. 2-9; paragraph 3;</p> <p>“More than 20 million acres of open space within the SCAG region is currently [insert]conserved [insert end] protected under a Habitat Conservation Plan or Natural Community Conservation Plan or will be protected by a future conservation plan that is currently in its planning stages. Data from CDFW and USFWS show 31 plans with durations of 16–80 years providing conservation efforts nearly 3 million acres in the SCAG region. These plans identify and provide for the regional protection of plants, animals and their habitats, while allowing compatible and appropriate economic activity.”</p> <ul style="list-style-type: none"> • Please cite sources of data and clarify numbers and language; is this additive or exclusive? 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.076	<p>#76 Clarification p. 2-12; footnote; sentence 4</p> <p>“SCAG used its best efforts to incorporate the RHNA, but the data is inherently incomplete because only 12 of 197 jurisdictions had certified housing elements, and some local jurisdictions may not be required to complete rezoning associated with housing elements until October 2024.”</p> <ul style="list-style-type: none"> • Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.077	<p>#77 Clarification p. 2-13; paragraph 2; sentence 1</p> <p>“SCAG has the opportunity to analyze and address the inequities that the [insert] public, [insert end] government, and planning profession have created by systemically driving and perpetuating societal differences along racial lines.”</p> <ul style="list-style-type: none"> • Planners and government are not the only parties responsible 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.078	<p>#78 Clarification p. 2-13; paragraph 3; last sentence</p> <p>“This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces and conserve the region’s resource areas.”</p> <ul style="list-style-type: none"> • Clarify “if fully realized” 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.079	<p>#79 Clarification p. 2-13; bullet 1; sentence 2</p> <p>“Transit Priority Areas (TPAs). ...Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands.”</p> <ul style="list-style-type: none"> • Clarify how and explain the assets TPAs can reinforce 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.080	<p>#80 Clarification Table 2-2;</p> <p>All goals should have same language as in Connect SoCal main report.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.081	<p>#81, Clarification, Table 2-2 p. 2-19</p> <p>“15. Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the existing transportation system instead of adding roadway capacity, where possible.</p> <p>16. Prioritize transportation investments that increase travel time reliability, including build-out of the regional express lanes network.”</p> <ul style="list-style-type: none"> • Language is not consistent with Connect SoCal 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.082	<p>#82, Correction, Table 2-2;</p> <p>“15. Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the existing transportation system instead of adding roadway capacity, [insert]where possible.[insert end]</p> <p>16. Prioritize transportation investments that increase travel time reliability, including build-out of the regional express lanes network.”</p> <ul style="list-style-type: none"> • Language is not consistent with Connect SoCal 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.083	<p>#83 Clarification Table 2-2; p. 2-19 “ 22.</p> <p>[insert] Reduce [insert] Eliminate transportation-related fatalities and serious injuries on the regional multimodal transportation system.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.084	<p>#84 Addition Table 2-2; p. 2-20</p> <p>Add new 42. [insert] Support a mix of housing types throughout the region; including single-family detached development, which can increase equity-building opportunities for all income levels. [insert]</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001778.085	<p>#85 Correction Table 2-2; p. 2-22</p> <p>“73. Advance comprehensive systems-level planning of corridor/supply chain operational strategies [insert] that is,[insert] integrated with road and rail infrastructure, and inland port concepts.”</p> <ul style="list-style-type: none"> • Reword to match Connect SoCal p. 120 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.086	<p>#86 Clarification Table 2-2; p. 2-23</p> <p>“89. Encourage the reduced use of cars by visitors to the region by working with state, county, and city agencies to highlight and increase access to [insert] safe [insert end] alternative options, including transit, passenger rail, and active transportation.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.087	<p>#87 Clarification Table 2-2; p. 2-23</p> <p>“89. Encourage the reduced use of cars by visitors to the region by working with state, county, and city agencies to highlight and increase access to safe alternative options, including transit, passenger rail, and active transportation.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.088	<p>#88 Clarification Map 2-1</p> <ul style="list-style-type: none"> • Add page number • Add label for Orange County • Change source to SCAG 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.089	<p>#89 Clarification Map 2-2</p> <ul style="list-style-type: none"> • Add page number • Add label for Orange County • Change source to SCAG 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.090	<p>#90 Clarification Map 2-3</p> <ul style="list-style-type: none"> • Add page number • Bus routes and freeways are hard to differentiate 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.091	<p>#91 Clarification Map 2-5</p> <ul style="list-style-type: none"> • Add page number • Add year to title 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.092	<p>#92 Clarification Map 2-6</p> <ul style="list-style-type: none"> • Add page number • Why only major airports? 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001778.093	<p>#93 Clarification Map 2-7</p> <ul style="list-style-type: none"> • Add page number • Add year to title • Add note specifying land use categories were standardized by SCAG. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.094	<p>#94 Clarification p. 2-42 Map 2-8</p> <ul style="list-style-type: none"> • Add page number • Add year to title • Add language to map and/or map page <p>“Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling.</p> <p>The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.095	<p>#95 Clarification, Map 2-9</p> <ul style="list-style-type: none"> • Add page number • Add year to title 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.096	<p>#96 Clarification Map 2-10</p> <ul style="list-style-type: none"> • Add page number • Add year to title 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.097	<p>#97 Clarification Map 2-11</p> <ul style="list-style-type: none"> • Add page number • Add year to title 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.098	<p>#98 Clarification Map 2-12</p> <ul style="list-style-type: none"> • Add page number • Add city boundaries to legend 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.099	<p>#99 Clarification p. 2-47</p> <p>[insert]“U.S. Census Bureau American Community Survey 2017 1-Year Estimates,[insert end] American FactFinder. [stikethrough end] 2017. 2017 Population Estimates. https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml. Accessed July 29, 2019.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.100	<p>#100 Correction p. 3-5; paragraph 5; sentence 3</p> <p>[insert]“The [insert] regional growth forecast process incorporates extensive input and data including the most up-to-date local land use information, policy responses, demographic...”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.101	<p>#101 Clarification, p. 3-5; footnote</p> <p>“SCAG’s regional growth forecasting process emphasized the participation of local jurisdictions [strikethrough] and other stakeholders.[Strikethrough end] The Local Data Exchange (LDX) process was used to give local [strikethrough]jurisdiction’s[strikethrough end] [insert] jurisdictions the [insert end] opportunity to provide input related to land use and the future growth of employment and households to ensure that the most updated information from local jurisdictions was gathered to link and align local planning with a regional plan that can meet federal and state requirements and reflect a regional vision. Therefore, LDX was a key component of allocation of growth across jurisdictions in the SCAG region with 67% of jurisdictions providing information as part of the LDX process. [insert]The deadline for local jurisdiction in the LDX process was December 2022.”[insert end]</p> <ul style="list-style-type: none"> • Who are the “other stakeholders”? Did the public or other groups have input into the growth forecast? Does this refer to the panel of experts? 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.102	<p>#102 Existing Conditions 3.8-7</p> <p>The draft EIR states "The Safeguarding California Plan was updated in 2018 to present new policy recommendations and provide a road map of all the actions and next steps...".</p> <p>Is the Safeguarding California Plan supposed to be updated every three years? Has the State developed an updated list of policy recommendations and implementation actions that should also be referenced in this section? Or is the approach to keep the discussion to the 2018 California Plan, because of the emphasis on Existing Conditions?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.103	<p>#103 Existing Conditions: SCAG Region3.8-10 3.8-57 3.8-59</p> <p>In the second paragraph to this section, please re-review and re-check the Table numbers, table titles, and percentage (for Imperial County assigned to transportation GHG emissions), and correct, as appropriate. For example, the title referenced in this paragraph for Table 3.8-7 does not match the title actually assigned to Table 3.8-7 on page 3.8-57. Also, there are references to county-level GHG data that are not in Table 3.8-7 (is it supposed to be Table 3.8-10 on page 3.8-59?). Further, there is a reference to Imperial County generating, in 2019, 1.7% of the region's total transportation GHG emissions, which is not illustrated in any applicable county table of data.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.104	<p>#104, Regulatory Framework: Orange County, 3.8-42</p> <p>The section on Orange County's regulatory framework for GHG reductions cites a 2023 Orange County Register source on Orange County moving "forward with developing a county climate action plan to address ways the county could help slow climate change and mitigate the local effect."</p> <p>Please confirm and identify the agency/agencies in charge of developing an Orange County climate action plan.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.105	<p>#105 Table 3.8-6: Jurisdictions Addressing Climate Change, 3.8-44</p> <p>Having two distinct listings of jurisdictions from distinct counties on the same page, with said listings extending into multiple pages, was initially confusing in Table 3.8-6.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.106	<p>#106 Transportation Emissions: OGV, 3.8-58 3.8-59</p> <p>Please include the acronym OGV in the EIR Glossary.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.107	<p>#107, SB 743 and VMT Guidance. 3.8-65</p> <p>This section of the draft EIR states "At the time of preparing this 2024 EIR it is unknown how CARB and the other state agencies, through statewide programs or in coordination with local and regional governments, [bold] would meet the identified higher VMT reductions." [bold end]</p> <p>Please include a short summary of what the higher SB 743 VMT targets are, to prevent the reader from having to research and understand the degree of context.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.108	<p>#108 Mitigation Measures: GHG 3.8-66 to 3.8-69</p> <p>Please see comments, proposed revisions and edits from the draft EIR Executive Summary, Table ES-3: Summary of Project Impacts, Mitigation Measures and Residual Impacts, relating to the GHG mitigation measures (pages ES-47 through ES-50), and carry over to Chapter 3.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.109	<p>#109 3.11.1: Environmental Setting Definitions: Recreation. 3.11-2</p> <p>Definition of "recreation". Please identify if recreation areas include both public and private-owned parks and open space areas. As an example, private parks and open space can satisfy local parks requirements for residential developments, with ownership of said private parks and open space by homeowner associations.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.110	<p>#110 Clarification 3.11.1: Environmental Setting Definitions: Subregion, 3.11-2 Map ES-2 ES-4</p> <p>Definition of "subregion". Map ES-2 illustrates 16 subregions in the map Legend, but page ES-4 (of the Executive Summary) and page 3.11-2 of this chapter state there are 15 subregions in the SCAG region. Please review and correct inconsistency.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.111	<p>#111 3.11.1: Environmental Setting Definitions: Vacant Land Existing Land Uses, 3.11-3</p> <p>Definition of "vacant land" is described in this chapter as land that "is generally referred to land with no buildings on it." Please clarify if the designation of vacant land includes land with no buildings on it, but with improvements such as surface parking lots. This issue has come up in local jurisdiction review of parcel level existing land uses and how to appropriately classify such land uses. Perhaps the inclusion of the term "undeveloped" or "no improvements", as are used in the narrative on vacant lands on page 3.11-3, would be of benefit.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.112	<p>#112 Clarification p. 3.11-5; paragraph 1</p> <p>"The SCAG region is composed of six counties: Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The Plan's policies and strategies encourage improvement in the jobs-housing balance by focusing new housing and employment in Priority Development Areas (PDAs). A general discussion of the land use patterns is provided for each of the six SCAG counties below and [insert]is sourced from each County government's General Plan [insert end]:"</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.113	<p>#113 3.11.1: Environmental Setting Counties: Orange 3.11-5; paragraph 6</p> <p>"Between 2000 and 2019, the total population of Orange County increased by 12.1 percent, which was slightly higher than the SCAG region increase of 14 percent. The [insert] County of Orange's General [insert end] Plan assessed that Orange County would experience a steady but declining amount of land available for development."</p> <ul style="list-style-type: none"> • Please re-check the numbers. The percentages comparison and the conclusion do not match. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.114	<p>#114 Clarification, p. 3.11-6</p> <p>"San Bernardino. Between 2000 and 2019, the total county population increased by 27.2 percent (U.S. Census Bureau 2002; SCAG 2021, 2023a); well above the SCAG [insert]regional [insert end] [strikethrough]region[strikethrough end] increase of 14 percent (SCAG 2021, 2023a). Much of the development in San Bernardino has occurred onunincorporated county land. The [insert]County of San Bernardino's [insert end] General Plan..."</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.115	<p>#115 3.11.1: Environmental Setting Counties: Ventura 3.11-6</p> <p>In the discussion of Ventura County, this chapter states "Between 2000 and 2019, Ventura County's population growth increase of 12.8 percent was slightly higher than the SCAG region increase of 14 percent."</p> <ul style="list-style-type: none"> • Please re-check the numbers. The percentages comparison and the conclusion do not match. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.116	<p>#116 Clarification p. 3.11-8; paragraph 2; sentence 6</p> <p>"[strikethrough] City and county general plans must be consistent with each other.[strikethrough end] Local jurisdictions implement their general plans through zoning ordinances. Zoning ordinances provide a much greater level of detail including the general plan land use designations and such information as permitted uses, yard setbacks, and uses that would require a conditional use permit (Map 3.11-1, General Plan Land Use Designations, shows the general land use designations (consolidated for purposes of consistency and mapping) for the six [strikethrough] SCAG member [strikethrough end] counties and 191 cities in the SCAG region)."</p> <ul style="list-style-type: none"> • "City and county general plans must be consistent with each other." This statement is not accurate. Delete. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.117	<p>#117 Clarification p. 3.11-8; paragraph 3&4</p> <p>"The land use elements of the county and city general plans within the SCAG region generally classify lands [insert] into [insert end] [strikethrough] in to [strikethrough end] 35 land use categories (Table 3.11-2, SCAG Region General Land Use Categories).</p> <p>According to [insert] modeling results of the SPM data, [insert end] the Plan would add approximately 50,000 urbanized acres to the region by 2050 (SCAG 2023c)."</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.118	<p>#118 3.11.1: Environmental Setting Existing Land Uses by County, 3.11-8</p> <p>In the discussion of existing land uses by county, this chapter states "According to SPM data, the Plan would [bold] add [bold end] approximately 50,000 urbanized acres to the region by 2050." To avoid any misinterpretation of the 50,000 acres comprising new acreage being added to the region, perhaps the verb "add" could be revised to explain that the Plan incorporates land use changes to existing acreage (i.e., through infill or redevelopment, in addition to greenfield development)?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001778.119	<p>#119 3.11.1: Environmental Setting Existing Land Uses by County Table 3.11-2 3.11-8; Table 3.11-2</p> <p>In the discussion of existing land uses by county, this chapter states "The 35 land uses noted in Table 3.11-2 are grouped into [bold] three [bold end] Land Development Categories (LDCs) to describe the general conditions in a given area, including urban, compact and standard LDCs". In reviewing Table 3.11-2, there seems to be a mismatch between the narrative on page 3.11-8 and the presentation of information on Table 3.11-2. As an example, Table 3.11-2 seems to list 34 land uses. There also does not seem to be any correlation between LDC designations and Table 3.11-2, which is implied in the narrative. Perhaps clarify in the narrative on page 3.11-8 that the LDC grouping is a subsequent process.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.120	<p>#120 Clarification 3.11-10; paragraph 3</p> <p>"The majority of medium- and high-density housing in the region is found in the urban core of the region, in Downtown Los Angeles, East Los Angeles, the South Bay, and the "West Side" of Los Angeles. Large cities, such as Long Beach, Santa Ana, Glendale, Oxnard, and Pasadena, also have concentrations of high-density development in their downtown areas. Several beach communities, such as the Cities of Santa Monica, Manhattan Beach, Hermosa Beach, Redondo Beach, Huntington Beach, and Newport Beach, have high density close to the ocean."</p> <ul style="list-style-type: none"> • Define 'high-density' • If density calculations were made using the Census Bureau geographic boundaries, which include ocean areas for coastal cities, the density calculations may need to be redone. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.121	<p>#121 Clarification 3.11-11; paragraph 3</p> <p>"Multifamily units—[insert] a term that SCAG uses to generally classify homes other than single-family detached housing units [insert end]—are attached residences, apartments, condominiums, and [insert]also include [insert end] townhouses, [insert] which are classified by the State and U.S. Census Bureau as single-family attached homes." [insert end]</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.122	<p>#122 Clarification 3.11-11; paragraph 5</p> <p>"Duplexes, Triplexes, and 2- or 3-Unit Condominiums and Townhouses. This category is composed of duplexes, triplexes, and 2- or 3-unit condominiums, [insert] which are all multi-family structures [insert end] and townhouses—[insert] which are actually attached single-family units[insert end] [insert] that are attached multifamily structures." [insert end]</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.123	<p>#123 Clarification 3.11-11; paragraph 8</p> <p>"Typically, low-rise apartments, [insert] and [insert end] condominiums, [insert] and townhouses occur together in large contiguous areas since land use is restricted to multi-family zoned areas."</p> <ul style="list-style-type: none"> • Townhomes are single-family housing units. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001778.124	<p>#124 Correction 3.11-12; paragraphs 1 & 3</p> <p>“Medium-Rise Apartments and Condominiums. This category includes multi- family structures of three to four stories and [insert] greater than [insert end] > 18 units/acre....</p> <p>High-Rise Apartments and Condominiums. This category includes multi- family structures of five stories or greater and [insert] greater than [insert end] > 18 units/acre.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.125	<p>#125 Clarification 3.11-14; paragraph 3</p> <p>“OPEN SPACE, RECREATION, AND AGRICULTURAL LAND USES..</p> <p>In yet other instances, lands may be designated or zoned as open space but still allow for development of a single-family home. Lands evaluated as natural lands in the Plan are generally evaluated as wildlife habitat in Section 3.4, Biological Resources, and not agricultural lands. In general, in this 2024 PEIR, agricultural lands are farmlands, and natural lands provide valued habitat.”</p> <ul style="list-style-type: none"> • Some land that is currently used for agriculture is zoned for other purposes but is temporarily being used for agriculture and the long- term expectation is that the land will be developed for housing or commercial. Please clarify in the narrative whether land classification is by use or by zoning and update any calculations as applicable. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.126	<p>#126 Clarification 3.11-16-17; Table 3.11-4</p> <p>Use full name of Source in tables instead of acronyms.</p> <p>“Source: [insert] California Coastal Commission [insert end] [strikethrough]CCC [strikethrough] 2019” and add link to source website</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.127	<p>#127 Clarifications 3.11-21; paragraph 4</p> <p>“The California Coastal Act constitutes the California Coastal Management Program for the purposes of the Federal Coastal Zone Management Act (California Coastal Act of 1976; PRC Section 30000 et seq.). The act established the [insert] California Coastal Commission [insert end] (CCC), identified a designated California Coastal Zone, and established CCC’s responsibility to include the preparation and ongoing oversight of a Coastal Plan for the protection and management of the Coastal Zone. Each local jurisdictional authority (city or county) with lands within the coastal zone is required to develop, and comply with, a coastal management plan. The Coastal Act requires that any person or public agency proposing development within the Coastal Zone obtain a [insert] Coastal Development Permit [insert end] (CDP)...”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.128	<p>#128 Clarification 3.11-21; bullet 1</p> <p>“a) The project is in a transit priority area;”</p> <ul style="list-style-type: none"> • List source and define transit priority area even if defined in a previous chapter 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001778.129	<p>#129 3.11.1: Environmental Setting Sustainable Communities and Climate Protection Act 3.11-24; paragraph 2</p> <p>Page 3.11-24, second paragraph, discusses the interrelationship between RHNA and the regional transportation plan processes. This section states "The RHNA, which is developed after the regional transportation plan, must also allocate housing units within the region consistent with the forecasted regional development pattern included in the SCS."</p> <ul style="list-style-type: none"> • Is this an accurate statement relating to SCAG's RHNA and Connect SoCal planning processes? 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.130	<p>#130 Clarification 3.11-24; paragraph 2</p> <p>"Previously, the RHNA determination was based on population projections produced by DOF. SB 375 requires the determination to be based upon population projections by DOF and regional population forecasts used in preparing the regional transportation plan. If the total regional population forecasted used in the regional transportation plan is within a range of [insert] 1.5[insert end] [strikethrough] three percent [strikethrough ends] percent of the regional population forecast completed by DOF for the same planning period, then the population forecast developed by the regional agency and used in the regional transportation plan shall be the basis for the determination. If the difference is greater than [insert] 1.5[insert end] [strikethrough] three percent [strikethrough ends], then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by DOF. [insert] Though SCAG's total regional population projections from the regional transportation plan were within 1.5 percent of the Department of Finance projections, HCD rejected the use of SCAG's population projections from the applicable 2020 Connect SoCal Plan for the 6th Cycle of RHNA. [insert end]"</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.131	<p>#131 Mitigation Measures: SMM-LU-1 3.11-28</p> <p>Mitigation Measure SMM-LU-1 states that SCAG shall work with the region's county [insert] transportation [insert end] commissions and Caltrans in the siting of new transportation facilities in residential areas, to minimize future impacts to established communities.</p> <p>Is there any need or value to also referencing the Transportation Corridor Agencies in this mitigation measure? Also recommend that [insert] transportation [insert end] be added to the mitigation measure language, to confirm what is implied intent.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.132	<p>#132 Clarification, 3.11-33; Map 3.11-1</p> <ul style="list-style-type: none"> • Add page number • Source year should be 2019 not 2016 • Add data year to title • Add link to where land use definitions are • Explain if these are the consolidated land use categories and not the original jurisdiction maps 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.133	<p>#133 Clarification 3.14-1; Bullet list</p> <p>“Employment: [insert] Also known as “jobs”, employment includes both wage and salary workers and self-employed workers [insert end]. Paid, [insert] wage and salary [insert] employment consists of full- and part-time employees, including salaried officers and executives of corporations, who were on the payroll in the pay period. Included are employees on sick leave, holidays, and vacations; not included are proprietors and partners of unincorporated businesses.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.134	<p>#134 Clarification 3.14-1; Bullet list</p> <p>“Housing unit: A house, an apartment or other group of rooms, or a single room are regarded as housing units when occupied or intended for occupancy as separate living quarters. These include [insert] single-family and multi- family units as well as accessory dwelling units (ADUs).[insert] Different jurisdictions have slightly different definitions of what constitutes a housing unit.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.135	<p>#135 Clarification 3.14-1; Bullet list</p> <p>“Population: As used in this analysis, population is data available from the U.S. Census [insert] Bureau [insert end] for the SCAG region for the period of 1900 through [insert] 2022 [insert end] 2019 [insert] and from the State Department of Finance [insert end], with population projections available from SCAG in 2023 for the projected population growth through 2050.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.136	<p>#136 Clarification 3.14-2; paragraph 2; sentence 5</p> <p>“Historically, population within the SCAG region was heavily influenced by net migration, or the difference between people coming into an area (immigrating) and the people leaving an area (emigrating) as opposed to [insert] natural [insert end] the increase, [insert] which is the number [insert end] of births over deaths. However, since about 2000, net migration has slowed and has resulted in slower population growth across the SCAG”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.137	<p>#137 Clarification 3.14-2; paragraph 3; sentence 3</p> <p>“The change is largely attributed to four key factors: (1) lower birth rates (fewer children), (2) lower immigration rates (fewer immigrants, [insert] both domestic and international [insert end]), (3) aging population (fewer at childbearing age), and (4) high housing costs (lack of housing) (SCAG 2023a).</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.138	<p>#138 Clarification 3.14-2; Table 3.14-1</p> <p>Change rates in table to display in percentages instead of raw number, e.g., use 22.6% instead of 0.226 as seen in Table 3.14-7.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.139	<p>#139 Clarification 3.14-3; paragraph 2; last sentence</p> <p>“At a fundamental level, there is simply not enough housing for everyone who wants to live [insert] on their own [insert end] in the state.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.140	<p>#140 Correction 3.14-4; Table 3.14-3 source</p> <p>“Connect SoCal 2024 base year, based on 2020 U.S. Decennial [insert end] [strikethrough] decennial [strikethrough] Census [insert] P.L. 94-171 Redistricting data [insert end] [strikethrough] PL-94 redistricting [strikethrough] file and 2019 DOF E-5 estimates”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.141	<p>#141 Correction 3.14-4; Table 3.14-4 source</p> <p>“4. U.S. Census Bureau bureau 2020, American Community Survey 2020 1- year estimates, Table table B17001 5. U.S. Census Bureau bureau 2021, American Community Survey 2021 1- year estimates, Table table S1701</p> <p>Verify if these are rates (raw number instead of displaying as a percent) or if they are rates per another population number, e.g., per 1,000 people. If raw numbers, change rates in table to display in percentages instead of raw number, e.g., use 23.8% instead of 0.238 as seen in Table 3.14-7 Update title and add notes as needed to clarify.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.142	<p>#142 Clarification 3.14-7 & 8; Tables 8-10</p> <p>Ensure totals match data in main RTP report</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.143	<p>#143 Clarification 3.14-11; paragraph 3; sentence 2</p> <p>“At the time of preliminary [insert] Plan [insert end] forecast development (April 2022) only 12 of the region’s 197 jurisdictions had 6th cycle housing elements which had been adopted and certified by the state.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.144	<p>#144 Clarification 3.14-13; paragraph 2; last sentence</p> <p>“In addition, decisions made regarding the building and expansion of transportation systems divided communities of color and primarily benefited non-Hispanic [insert] White [insert end] [strikethrough] white [strikethrough end] suburban commuters.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.145	<p>#145 Clarification 3.14-16; paragraph 2; sentence 3</p> <p>“In accordance with SB 197, zoning must be updated to reflect the 6th cycle RHNA by October 2025.”</p> <ul style="list-style-type: none"> • October 2025 date is inconsistent with other dates of October 2024 listed throughout documents • Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001778.146	<p>#146 Clarification 3.14-16; Table 3.14-11</p> <ul style="list-style-type: none"> • Title “Summary of Housing Goals by County [insert] Governments [insert end] in the SCAG Region” • Header: County [strickethrough] and [strickethrough end] City Policies and Ordinances [Note: these are pulled from the Counties’ General Plans and not cities] • Change listing of 6 counties to • [insert] County of [insert end] Imperial • [insert] County of [insert end] Los Angeles • [insert] County of [insert end] Orange • [insert] County of [insert end] Riverside • [insert] County of [insert end] San Bernardino • [insert] County of [insert end] Ventura 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.147	<p>#147 Clarification 3.14-22; paragraph 2; sentence 2</p> <p>“However, transit [insert] stations [insert end] [strickethrough]station[strickethrough end] are generally located in areas that are already developed or where growth is planned and desirable.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.148	<p>#148 Clarification 3.14-22; paragraph 4; sentence 1</p> <p>“As discussed above and in Chapter 2, Project Description, the Plan’s [insert] forecasted [insert end] [strickethrough] forecast [strickethrough end] regional development pattern provides for a projected population distribution that could occur in 2050. The total SCAG region population is expected to increase by approximately 1.3 million persons by 2050. The Regional Planning Policies and Implementation Strategies included in the Plan would encourage growth in PDAs and [insert] reduce [insert end] [strickethrough] minimize [strickethrough end] growth in GRRAs.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.149	<p>#149 Clarification 3.14-22; paragraph 7; sentence 1</p> <p>Please clarify if this is referring to accommodating growth in PDAs and if the housing reference is also to growth. Consider revising to: “Implementation of the Plan would accommodate [insert]a majority [insert end] [strickethrough] 60.4 percent [strickethrough end]of the region’s future [strickethrough]population[strickethrough end] growth [insert] in PDAs: 60.4 percent of the population growth, 61.2 percent of the [insert] household growth [insert end], [strickethrough] region’s future housing units [strickethrough ends], and 64.8 percent of [strickethrough] the future [strickethrough end] employment growth [strickethrough]in PDAs [strickethrough end] (SCAG 2023d).”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.150	<p>#150 Clarification 3.14-23 “SMM-POP-1 SCAG shall continue to facilitate collaboration forums, such as through SCAG’s [insert]Working [insert end] Housing Group...”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.151	<p>#151 Clarification 3.14-24; paragraph 6; sentence 1</p> <p>“In urban areas, redevelopment often has the potential to displace affordable housing and can disproportionately affect people of color, particularly [insert] non-Hispanic [insert end] Black and [insert] non-Hispanic [insert end] Indigenous populations.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.152	<p>#152 Clarification 3.14-28; Map 3.14-1</p> <ul style="list-style-type: none"> • Add page number 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.153	<p>#153 Clarification 3.14-29; Map 3.14-2</p> <ul style="list-style-type: none"> • Add page number • Add language to map and/or map page "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level." 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.154	<p>#154 Clarification 3.14-30; Map 3.14-3</p> <ul style="list-style-type: none"> • Add page number • Add language to map and/or map page "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level." 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.155	<p>#155 Clarification 4-5; paragraph 1; sentence 2</p> <p>"As a result, Connect SoCal 2024 is SCAG's first RTP/SCS to not modify local data inputs [insert] for housing and employment [insert end]."</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.156	<p>#156 Clarifications 4-6; paragraph 1; sentence 2</p> <p>"Key components include a forecasted regional development pattern based on expert projection, existing planning documents, and regional policies, and [regional policies] review by local jurisdiction through the year 2050, as well as a transportation network including a list of transportation projects and investments from CTCs on their planned near-term and long-term projects."</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.157	<p>#157 Section 4.3.2: Plan Elements: Transportation Elements: Work from Home, 4-7</p> <p>This section discusses and defines Work from Home. Please clarify if SCAG's definition of Work from Home applies both to full-time and part-time employees in SCAG's activities-based, travel demand model. Also, is there any estimate of the percentage of Work from Home employees that is assumed in the SCAG modeling?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.158	<p>#158 Section 4.4.1: Alternative 1: Transportation Element 4-9 ES-12</p> <p>The Alternative 1 transportation network is described as including the [bold] first year [bold end] of the previously conforming FTIP. However, in the Executive Summary of the Draft EIR, the Alternative 1 transportation network is defined as including [bold] the first two years [bold end] of transportation projects in the previously- conforming RTP or FTIP. Please review and correct.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.159	<p>#159 Section 4.5: Comparison of Alternatives: Alternative 1: Aesthetics, 4-12</p> <p>This section of the Alternative 1 analysis states that "The No Project Alternative would not include any transportation projects that could affect State Scenic Highways or vista points. Has there been a specific review of the Alternative 1 transportation project list to confirm this statement?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.160	<p>#160 Section 4.5: Comparison of Alternatives: Alternative 1: Agriculture and Forestry Resources 4-13</p> <p>This section of the Alternative 1 analysis states that under the Alternative 1: No Build/No Project scenario, that "The potential for conflicts with zoning land use designations, Williamson Act contracts, and/or other applicable regulations that protect agricultural and forestry resources and timberlands [bold]would also be less [bold end] because fewer agricultural lands would be converted to nonagricultural uses than under the Plan."</p> <p>Please re-review and verify if this statement is correct. If all the EIR Alternatives share the identical growth projections in population, households and employment, and if the Plan emphasizes infill development and a lesser impact on greenfield development, how would the No Build Scenario have a lesser impact on agriculture lands conversion to developed uses?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.161	<p>#161 Clarification 4-14; paragraph 3; sentence 3</p> <p>"For example, Segment 1 is in El Centro on the I-8; under the Plan, the segment would experience a decrease in VMT from light- and medium-duty cars of approximately 1,400 as compared to the No Project; however, heavy- duty truck traffic is expected to increase by over 200 daily trips under the Plan as compared to the No Project scenario. Since the majority of DPM [insert] (diesel particulate matter) [insert end] emissions and the associated health risk results from heavy-duty vehicles, the health risk would be greater in this segment under the Plan. The health risk under the Plan is anticipated to be less in most segments as compared to the No Project scenario. The total health risk summed across the analyzed segments under the Plan [insert] (1,553 in 1 million people) [insert end] would be less than the No Project (1,575 in 1 million)."</p> <ul style="list-style-type: none"> • Please clarify the 1,400 reference 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001778.162	<p>#162 Comparative Discussion of EIR Alternatives 4-17 4-19 4-24</p> <p>Especially within the same paragraph of EIR discussion, there are instances where the same EIR Alternative is given different terminology, which makes for a very confusing read for the reader to understand the differences, if any. As an example, on page 4-17 and page 4-24,, Alternative 1 is called the No Project Alternative, the No Plan, and the No Plan Alternative.</p> <p>Also, on page 4-19 and 4-24, the Plan is termed both The Plan and Connect SoCal 2024.</p> <p>It would be ideal if the same terminology could be used within the same paragraph to avoid initial confusion</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.163	<p>163 Clarification 4-19; paragraph 4</p> <p>SCAG Natural Lands Conservation Areas- what are these?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.164	<p>#164 Clarification 4-21; paragraph 1</p> <p>"Alternative would result in greater impacts related to the [strikethrough] wasteful[strikethrough end], inefficient, or unnecessary consumption of energy during construction activities and long-term operations and impacts would remain significant."</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.165	<p>#165 Clarification 4-21; paragraph 4</p> <p>Add definition of "seiche" even if already included in previous chapter</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.166	<p>#166 Clarification 4-22; paragraph 4; sentence 4</p> <p>"The same is true for existing requirements and regulations addressing potential safety hazards and excessive noise within an airport land use plan or within two miles of a public or public- use airport, so airport-related safety and noise impacts to people residing or working in the Plan area would be the same under this alternative."</p> <ul style="list-style-type: none"> • What is the difference between public and public-use airport? 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.167	<p>#167 Clarification 4-22; footnote & p. 4-35</p> <p>"Airport Ground Support [insert] Equipment [insert] (GSE) sources"</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.168	<p>#168 Clarification 5-4</p> <p>4-22; last paragraph; last sentence, "Therefore, the more dispersed land use pattern of this alternative and lack of transportation system improvements would result in greater impacts associated with emergency access along with and emergency response and evacuation plans, and impacts would be significant."</p> <p>4-36 Please clarify the listings within the sentence.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001778.169	<p>#169 Section 4.5: Comparison of Alternatives: Alternative 1: Population and Housing 4-25</p> <p>This section of the Alternative 1 analysis states that under the Alternative 1: No Build/No Project scenario, that "the lack of large-scale transportation projects under this alternative would also reduce the potential" for right-of-way acquisition that would lead to potential displacement of existing housing and affected populations. Has the list of programmed FTIP projects in Alternative 1 been reviewed to confirm this statement?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.170	<p>#170 Clarification 4-25; paragraph 2</p> <p>"The No Project Alternative assumes a more dispersed growth pattern, which may result in less pressure to redevelop existing sites, [insert] and therefore [insert end] [strikethrough]and that are the [strikethrough end] result in [strikethrough] induce direct population growth by encouraging [strikethrough end] new residential and commercial development within more rural or suburban settings [strikethrough]where such growth may not have been planned.[strikethrough end]</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.171	<p>#171 Section 4.5: Comparison of Alternatives: Alternative 1: Transportation, 4-29</p> <p>This section of the Alternative 1 analysis states that under the Alternative 1: No Build/No Project scenario, that "impacts related to design hazards for transportation projects would be [bold] greater [bold end], as fewer transportation projects that meet current design standards would be constructed and [bold]the Plan's focus on safety would not be implemented."[bold end]</p> <p>Would this categorical statement be accurate? Is not safety still a requirement for the Connect SoCal 2020 projects that are programmed and included in Alternative 1?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.172	<p>#172 Clarification All pages; 4-31; Agriculture and Forestry Resources; e.g. 5-3</p> <p>Pertaining to any discussion on farm land lost or at risk, it should be noted that [bold] not all land used for farming is/was permanent farmland [bold end] and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate [bold]"not all land used for farming was permanent farmland [bold end] and was not necessarily designated in the zoning code or general plan for farming."</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.173	<p>#173 Clarification 4-34;</p> <p>"This alternative would result in [strikethrough] less [strikethrough end] [insert] fewer [insert end] impacts related to [strikethrough]the wasteful,[strikethrough end] inefficient, or unnecessary consumption of energy during construction activities and long-term operations."</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001778.174	<p>#174 Clarification 4-40; paragraph 6</p> <p>"The performance comparison for the [insert] alternatives [insert end] [strikethrough] No Project Alternatives [strikethrough] and the Plan is included in the Connected SoCal 2025 Land Use and Community Technical Report."</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.175	<p>#175 Terminology 5-3 5-6</p> <p>Page 5-3, Air Quality section, references the "Southern California Air Quality Management District (SCAQMD). Please correct as the "South Coast Air Quality Management District.</p> <p>Page 5-6, Wildfire section, references the need to discourage development in PGAs. In the Glossary, a PGA is defined as "Peak Ground Acceleration." Should the reference be PDA (Priority Development Area)?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.176	<p>#176 Clarification 5-3</p> <p>Agriculture and Forestry Resources section discusses land converted to non- agricultural use. Please clarify if the land is zoned for agriculture or being used temporarily with agriculture uses but zoned as another use.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.177	<p>#177 Clarification 5-4</p> <p>"Energy: Implementation of the Plan has the potential to result in [strikethrough] wasteful [strikethrough], inefficient, or unnecessary energy consumption in the SCAG region."</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.178	<p>#178 Clarification 5-4</p> <p>#178</p> <p>"Greenhouse Gas Emissions (GHG): ...Furthermore, while GHG emissions are anticipated to decrease compared to existing conditions, they are not anticipated to be reduced sufficiently to meet the statewide GHG emissions reduction targets and GHG emissions resulting directly and indirectly from the Plan may result in significant and unavoidable impacts."</p> <ul style="list-style-type: none"> • Please clarify the reference to decreasing emissions [as of when] compared to existing conditions. • Reword second part of sentence to clarify the state as a whole isn't meeting the state-level targets even though SCAG has met the state-prescribed target. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.179	<p>#179 Clarification 5-8; Paragraph 2</p> <p>"However, construction activities related to transportation projects and land use development would nevertheless result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment and aggregate supply used in construction."</p> <ul style="list-style-type: none"> • Clarify what "fuel oil" is. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001778.180	<p>#180 Section 5.3: Growth Inducing Impacts 5-10</p> <p>This section, paragraph 6, page 5-10, states that the Plan does not plan "...for anything more than nominal or by-right growth in rural areas...", in addition to more efficient, compact growth in existing developed areas. Please confirm that the received Local Input from SCAG jurisdictions confirms the statement of there being nominal or by-right growth in rural areas, in the Plan.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001778.181	<p>#181 Clarification 5-11; paragraph 1; last sentence</p> <p>“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 [insert]discourage[insert end] [strikethrough] limit [strikethrough end] such development.”</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter SUB-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
Submitted by	Orange County Council of Governments	Submittal 0001779
0001779.01.1	<p>Table 3 Aviation and Airport Ground Access Technical Report Comments</p> <p>#1 General Comment, All pages Add “2024” to all technical report page headers’ titles</p>	Technical report page headers’ titles have been updated to include “2024”.
0001779.01.2	<p>#2 General Comment, All pages In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data</p>	Sources have been updated to reference the original data source, where applicable.
0001779.01.3	<p>#3 General Comment, All pages Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.</p>	Comment noted. The text has been updated to capitalize “Plan” where applicable.
0001779.01.4	<p>#4 General Comment, All pages For data that is not derived from Connect SoCal models, cite source.</p>	For data that is not derived from SCAG models, sources have been noted where applicable.
0001779.01.5	<p>#5 General Comment, All pages If definitions come from specific source or statute, include the reference in the narrative.</p>	Comment noted. References to specific sources or statutes for a given definition have been updated, where feasible.
0001779.01.6	<p>#6 General Comment, All pages Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</p>	Comment noted. Data on existing and planned infrastructure capacity, such as water and sewer capacity, are not available at the local and neighborhood levels.
0001779.01.7	<p>#7 General Comment, All pages Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.</p>	Where applicable, SCAG has added text to tables and graphics to reflect where numbers may not sum due to rounding.
0001779.01.8	<p>#8 General Comment, All pages Extra commas throughout . . . Example, page 15, 2nd paragraph, last sentence</p>	Comment noted. The text is updated.
0001779.02	<p>#9 Correction, p. 11 1st paragraph, there appears to be an unnecessary quotation mark before “on airport property...”</p>	Comment noted. Narrative text will be edited.
0001779.03	<p>#10 Correction, p. 11 3rd paragraph, second line, there appears to be an unnecessary parenthesis</p>	Comment noted. Narrative text will be edited.
0001779.04	<p>#11 Clarification, p. 12 2nd paragraph, spell out Imperial County Airport (IPL)</p>	Comment noted. Narrative text will be edited.
0001779.05	<p>#12 Clarification, p. 20 3rd paragraph. Should “Approximately 88 percent of travelers at LAX are O&D, and 22 percent are connecting passengers” be modified to add up to only 100%? Right now the total is 110%.</p>	Comment noted. Narrative text will be edited. The sentence now reads “88 percent of travelers at LAX are O&D, and 12 percent are connecting passengers”.
0001779.06	<p>#13 Clarification, p. 22 2nd paragraph, last sentence add “Region” to “Impact of COVID-19 on air passenger and cargo activity in the SCAG”</p>	Comment noted. Narrative text will be edited.
0001779.07	<p>#14 Correction, p. 33 2nd paragraph, extra parenthesis after NPIAS</p>	Comment noted. Narrative text will be edited.

ID	COMMENT	RESPONSE
0001779.08	#15 Correction, p. 52 Last paragraph, delete "go" or "reach" in "economic impacts of airports go reach outside airport property"	Comment noted. Narrative text will be edited. "Go" was removed.
0001779.09	#16 Clarification, p. 58 3rd bullet point, is there an extra "ground" in "airport ground airside ground"?	Comment noted. Narrative text will be edited to provide clarification.
0001779.10	#17 Correction, p. 70 Second sentence, delete "from" in "...employees will also access from the region's airports..."	Comment noted. Narrative text will be edited.
0001779.11	#18 General Comment, p. 74 Should SCAG be studying airport operations? Or surface transportation? Should the aviation technical report conclude that SCAG will study surface transportation interplay with aviation, rather than conclude SCAG will study airport planning?	Comment noted. Please see the Regulatory Framework section of the Aviation and Airport Ground Access Technical Report. Per California Code, a MPO's primary role in aviation systems planning is airport ground access (Government Code Section 65081.1). Federal law (23 U.S.C. Section 134(g)(3)(A), Metropolitan Transportation Planning) encourages MPOs to consult with officials responsible for other types of planning activities that are affected by transportation in the area, including airport operations. Finally, per FAA Guidance (FAA AC 150/5070-7-change1), the aviation systems and airport ground access planning conducted by the MPOs is not designed to guide, but rather complement, the planning efforts of the FAA, states and the airports.
Submitted by	Orange County Council of Governments	Submittal 0001780
0001780.01	Table 4: Congestion Management Technical Report Comments #1 General Comment, All Pages Add "2024" to all technical report page headers' titles	Technical report page headers' titles have been updated to include "2024".
0001780.02	#2, General Comment, All Pages In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data	Sources have been updated to reference the original data source, where applicable.
0001780.03	#3, General Comment, All Pages Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.	Comment noted. The text has been updated to capitalize "Plan" where applicable.
0001780.04	#4 General Comment, All Pages For data that is not derived from Connect SoCal models, cite source.	Sources have been updated to reference the original data source, where applicable.
0001780.05	#5, General Comment, All Pages If definitions come from specific source or statute, include the reference in the narrative.	Comment noted. References to specific sources or statutes for a given definition have been updated, where feasible.
0001780.06	#6, General Comment, All Pages Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.	Comment noted. Data on existing and planned infrastructure capacity, such as water and sewer capacity, are not available at the local and neighborhood levels.
0001780.07	#7, General Comment, All Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.	Where applicable, SCAG has added text to tables and graphics to reflect where numbers may not sum due to rounding.
Submitted by	Orange County Council of Governments	Submittal 0001781

ID	COMMENT	RESPONSE
0001781.01.1	<p>Table 5: Demographics and Growth Forecast Technical Report Comments</p> <p>#1 General Comment, All maps All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific technical report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.</p>	Comment noted. Maps are updated, where feasible.
0001781.01.2	<p>#2 General Comment, All maps with growth forecast and development types data Add language to map and/or map page "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."</p>	Map disclaimer added.
0001781.01.3	<p>#3 General Comment, All pages Add "Technical Report" and "2024" to the header of each page</p>	Technical report page headers' titles have been updated to include "2024".
0001781.01.4	<p>#4 General Comment, All pages In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data</p>	Sources have been updated to reference the original data source, where applicable.
0001781.01.5	<p>#5 General Comment, All pages Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.</p>	Comment noted. The text has been updated to capitalize "Plan" where applicable.
0001781.01.6	<p>#6 General Comment, All pages For data that is not derived from Connect SoCal models, cite source.</p>	This technical report has been reviewed and updates have been made to reflect original data sources where appropriate.
0001781.01.7	<p>#7 General Comment, All pages If definitions come from specific source or statute, include the reference in the narrative.</p>	Comment noted, various updates to references made throughout.
0001781.01.8	<p>#8 General Comment, All pages Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</p>	Comment noted. Data on existing and planned infrastructure capacity, such as water and sewer capacity, are not available at the local and neighborhood levels.
0001781.02.1	<p>#9 General Comment, All pages Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, otherwise known as "Spheres of Influence" the growth must be feasible</p>	Comment noted.
0001781.02.2	<p>#10 General Comment, All pages Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.</p>	Where applicable, SCAG has added text to tables and graphics to reflect where numbers may not sum due to rounding.

ID	COMMENT	RESPONSE
0001781.03	<p>#11 Clarification, All pages</p> <p>Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>	Comment noted.
0001781.04	<p>#12 Correction, All pages</p> <p>References and source citations to the American Community Survey dataset should use the word "estimates" not "sample", e.g., "Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates" or for PUMS: "Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021"</p>	Corrections made.
0001781.05	<p>#13 Define, Add Glossary</p> <p>Add glossary to technical report and define:</p> <p>ACS BLS DPH EDD GRRRA Headship rates LDX LED NAICS Overcrowding/rates PDA People of color PopSyn PUMS QWI racial/ethnic groups Sketch-planning sustainability p. 28 SWAA WFH</p>	<p>SCAG does not include glossaries in the Technical Reports, only as part of the main document. However, edits have been applied to spell out acronyms and add in-text definition of terms, where appropriate.</p>

ID	COMMENT	RESPONSE
0001781.06	<p>#14 Clarification, p. 5; paragraph 5; sentence 2</p> <p>“Long-range growth in an entire region, or within individual neighborhoods, cannot be [insert] specifically [end insert] predicted; however, probabilistically it is usually more likely to be nearer to the middle of a range than to the extremes.”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Edit made to paragraph to distinguish between projection and prediction.
0001781.07	<p>#15 Clarification, p. 7; paragraph 2; sentence 1</p> <p>“Between March and November 2022, SCAG staff [strikeout] initiated and [end strikeout] completed one-on-one meetings with 164 of the region’s 197 local jurisdictions to explain the methods and assumptions behind the preliminary small[insert]-[end insert]area growth forecast, as well as to provide an opportunity to review, edit and approve [insert] data [end insert] [strikeout] the provided maps as well as [end strikeout] [insert] and provide [end insert] jurisdiction and TAZ totals for households and employment in 2019, 2035, and 2050.”</p> <p>Note: jurisdictions were not asked to approve maps—they were asked to approve data illustrated in map format.</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarification made.
0001781.08	<p>#16 Clarification, p. 7; paragraph 3; sentence 2</p> <p>Remove or provide definition of “overcrowding rates”.</p>	Definition added.
0001781.09	<p>#17 Clarification, p. 7; paragraph 4; sentence 2</p> <p>“In order to meet the [insert] greenhouse gas [end insert] targets [insert] set by CARB [end insert] and implement the policies of Connect SoCal, these projections must be regionally balanced.”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Added reference to statutory targets as described in section 1.2 of Technical Report.
0001781.10	<p>#18 Clarification, p. 7; Table 2</p> <ul style="list-style-type: none"> • Add grey section header bar above SCAG Region HIOC row. • Bold SCAG region total rows 	Table updated.
0001781.11	<p>#19 Clarification, p. 8; paragraph 1; last sentence</p> <p>“These county-level projections provide a starting point for an even better balanced vision of 2050 which will require [strikeout] more [end strikeout] policies, strategies, and investments in order to achieve.”</p> <p>Please clarify sources and responsible parties of policies mentioned.</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified by referencing Connect SoCal's "Regional Planning Policies" and "Implementation Strategies" which can be found in the Plan's main document.

ID	COMMENT	RESPONSE
0001781.12	<p>#20 Clarification, p. 8; paragraph 2; sentence 1</p> <p>“According to Census 2020, which is the [insert] most recent [end insert] official count of record, the population of the SCAG region as of April 1, 2020 was 18,824,382.”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarification made.
0001781.13	<p>#21 Clarification, p. 9; Figure 3</p> <p>Change source wording to “U.S. Census Bureau Decennial Census P.L.94-171 downloaded from IPUMS NHGIS, University of Minnesota”</p>	Source information retained as-is to reflect both individual data sources used in this figure.
0001781.14	<p>#22 Clarification, p. 10; Figure 4</p> <p>Change and vary color and format of lines to better differentiate between all.</p>	This figure was reviewed and updated for clarity.
0001781.15	<p>#23 Clarification, p. 10; paragraph 1</p> <p>“While population decline is unprecedented [insert] in California [end insert], a substantial portion can...”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarification made.
0001781.16	<p>#24 Define, p. 13; paragraph 3</p> <p>Please provide definition of “people of color”.</p>	Definition provided in-text, in addition to reference to the detailed discussion in Section 2.3 of the Equity Technical Report.
0001781.17	<p>#25 Clarification, p. 13; paragraph 3; sentences 2-3</p> <p>“Rooted in historically and spatially embedded inequities, indicators such as household overcrowding and exposure to pollutants are typically higher for people of color[insert]; because [end insert][strikeout] . Because[end strikeout] of the markedly younger age structure for people of color, [insert]more[end insert] children will [insert]also[end insert] be disproportionately impacted by [strikeout] this regional inequity[end strikeout].</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.
0001781.18	<p>#26 Clarification, p. 13; paragraph 4; sentence 2</p> <p>“The groups whose share of the region are projected to grow by 2050 are (in descending order) [insert] non-Hispanic [end insert] Asian, [insert] non-Hispanic [end insert] Multiracial, [insert] non-Hispanic [end insert] Native Hawaiian/Pacific Islander, and Hispanic/Latino (Table [insert]4[end insert][strikeout] 5[end strikeout]).”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context.
0001781.19	<p>#27 Correction, p. 14; Figure 3.1.3</p> <p>Shading of Baby Boomers should be much darker shade of blue or white/hollow.</p>	Clarified using a hatched pattern.

ID	COMMENT	RESPONSE
0001781.20	<p data-bbox="212 94 659 118">#28 Clarification, p. 15; paragraph 2; sentence 2</p> <p data-bbox="212 152 1129 318">“This trend is nonlinear over the projection [insert]period[end insert] [strikeout] horizon[end strikeout]. By 2035, Baby Boomers will be ages 75 and older, Generation X will be at or approaching [insert]their senior years[end insert] [strikeout] retirement age [end strikeout][insert] (65 years+)[end insert], and Millennials and Gen Z will be in prime working age [insert](16-64 years)[end insert] but both will have aged out of prime childbearing age[insert] (generally 15-44 years)[end insert].</p> <p data-bbox="212 352 1129 402">[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.
0001781.21	<p data-bbox="212 418 680 443">#29 Clarification, p. 15; paragraph 3; last sentence</p> <p data-bbox="212 477 1129 553">“By 2022 regional employment had also matched its 2019 pre-COVID peak—which was 447,000 jobs greater than at the 2016 base year of the last Connect SoCal plan ([insert]Figure[end insert] [strikeout] Table [end strikeout]7).”</p> <p data-bbox="212 587 1129 638">[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.
0001781.22	<p data-bbox="212 654 512 678">#30 Clarification, p. 15; Figure 6</p> <ul data-bbox="212 712 1129 932" style="list-style-type: none"> • Add descriptors of “Housing Units” and “Household Size” to vertical/Y axis on Figure 6. • Lighten color for Single-Family Units as it is difficult to differentiate. • Change title “Figure 6. New Housing Units [insert]Permitted[end insert] and Average Household Size, SCAG Region, 2000-2022” • Change source “Source: [strikeout] CA DOF E-5 and [end strikeout][insert]Permits: [end insert]Construction Industry Research Board New Units from Permits. [insert]Household Size: CA DOF E-5 January 1 Estimates.[end insert] *2019 household size uses SCAG Growth Forecast in lieu of DOF to benchmark to Census 2020. <p data-bbox="212 966 1129 1019">[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Source information, shading, and vertical axes updated.
0001781.23	<p data-bbox="212 1036 499 1060">#31 Clarification, p. 16; table 5</p> <p data-bbox="212 1089 457 1112">Define “headship by age”.</p>	Clarified in table title and adjacent text.
0001781.24	<p data-bbox="212 1128 680 1153">#32 Clarification, p. 16; paragraph 2; last sentence</p> <p data-bbox="212 1187 1129 1237">“Due to aging alone, the number of households would be expected to increase by more than 26 percent, compared with 11 percent population [insert]overall [end insert]growth.”</p> <p data-bbox="212 1271 1129 1320">[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.

ID	COMMENT	RESPONSE
0001781.25	<p>#33 Clarification, p. 16; paragraph 4</p> <p>“Household sizes tend to increase in the years following low housing production. Housing production was especially low over 2008-2013 as a result of the Great Recession—household sizes plateaued at around 3.1 and began to decline [strikeout] precipitously [end strikeout] thereafter. This is related to the population growth slowdown coupled with relatively robust housing production, in addition to new Census 2020 data indicating more housing units in the region than were previously known to exist[insert]—likely due to better canvassing of neighborhoods and identification of new or non-permitted structures and conversions[end insert].”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.
0001781.26	<p>#34 Clarification, p. 16; paragraph 6; sentence 2 sentence 3</p> <p>“The 53,745 new units [insert]permitted [end insert]in the region in 2022 reflect a higher number of new units than at any single year since 2006. [insert]The higher number of units permitted is due in part to the increased in[end insert] [strikeout] These data likely [end strikeout]undercount accessory dwelling unit (ADU) production[insert]. A[end insert][strikeout] —a[end strikeout] newly available data series from the Department of Housing and Community Development show a rapid rise [insert]of ADUs in the region in recent years and over 11,000 ADUs in 2021. [strikeout] This suggests that total new unit construction in recent years is likely even higher than shown in Figure 6.[end strikeout]”</p> <ul style="list-style-type: none"> • Please clarify if 53,745 new units are referring to the number of units permitted or units completed. If using CIRB data, it is likely permits issued not units that completed construction. • Why would the data undercount ADUs and why is new unit construction higher? Is this referring to permitting or completed units or legal/permitted units vs. non-permitted units? • Is CIRB is questioning whether jurisdictions are reporting permits for new ADUs and permits for legalizing non-permitted ADUs? <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Reported new unit count clarified; additional detail added regarding ADU counting within the CIRB dataset.
0001781.27	<p>#35 Correction, p. 18; Figure 8; paragraph 1 sentence 2</p> <p>“Between 2016 and 2019, employment was growing and the P:E ratio declined (Figure [strikeout] 7[end strikeout])[insert]8-B[end insert]).”</p> <p>Recommend relabeling Figure 8 to Figure 8-A and Figure 8-B.</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	This combined figure (line + bar) has been changed to two separate line graphs.
0001781.28	<p>#36 Correction, p. 20; paragraph 1</p> <p>“Since 2000, SCAG [strikeout] region[end strikeout] [insert]regional [end insert]employment in the following four sectors...”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Changed throughout this technical report to “SCAG Region” using a capital R to denote a proper noun.

ID	COMMENT	RESPONSE
0001781.29	<p>#37 Correction, p. 21; paragraph 2</p> <p>“In constant 2022 dollars, the median wage in the SCAG region was \$23.23 in 2002, \$22.88 in 2012, and \$22.87 in 2022. Table [strikeout] 8[end strikeout][insert]7 [end insert] summarizes the wage ranges for each category.”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Changed.</p>
0001781.30	<p>#38 Clarification, p. 22; sentence 3</p> <p>paragraph 1</p> <p>“Although the region’s economy recovered quickly from the COVID recession, ...</p> <ul style="list-style-type: none"> • Please clarify how recovery is defined--# of jobs? # of businesses? Unemployment rate? Many businesses closed permanently. <p>sentence 3</p> <p>In 2021, the share of workers working from home shot up to over 19 percent. This trend has stabilized nationally, with approximately 20 percent of U.S. workers able to work from home [insert]for all or a portion of their work week [end insert](see Kane, Moreno, and Myers 2022).”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>In general, “regional economic recovery” refers to improvements to a region’s economic, political, and social well-being relative to a negative economic shock. Typically, regional economic well-being is measured in terms of GDP, per capital GPD, and employment/unemployment. For example, during the pandemic, SCAG region unemployment peaked at 17.3 percent in May 2020. A year later, it had nearly halved to 8.3 percent and by May 2022 unemployment was down to 3.9 percent across the SCAG Region. For a graphic showing the “quick recovery” please see employment chart in the SCAG Econ Trends Tool, https://scag.ca.gov/econtrends.</p> <p>Birth and death of businesses is a normal part of economic development. In 2022, business formation in the SCAG Region counties was over 32 percent larger than in 2019, before the pandemic (U.S. Census Business Formation Statistics, 2023). Without a doubt, many workers and businesses suffered during the pandemic, but the regional economy as a whole quickly recovered.</p> <p>A clarification and additional reference have been added to the work-from-home statistic shown.</p>
0001781.31	<p>#39 Clarification, p. 23; paragraph 3; sentence 3</p> <p>“This model computes population at a future point in time by adding to the existing [insert]residential [end insert]population [insert]to[end insert] the number of group quarters population, births, and in-migrants during a projection period and subtracting the number of deaths and out-migrants.”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Corrected.</p>
0001781.32	<p>#40 Correction, p. 26; paragraph 2; sentence 2</p> <p>“Regional totals by 2-digit NAICS sector are provided at the SCAG region level for 2019 and 2050 (Table [insert][strikeout] [sic]6[end insert]7[end strikeout]).”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Corrected.</p>

ID	COMMENT	RESPONSE
0001781.33	<p data-bbox="212 94 659 118">#41 Clarification, p. 27; paragraph 1; sentence 3</p> <p data-bbox="212 151 1129 232">“As such, the projection does not reflect a build-out scenario [insert]of all general plans throughout the region those some areas may reach first-stage build out or build out of a general plan’s capacity[end insert].”</p> <p data-bbox="212 264 1129 316">[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified that this refers to general plan build-out.
0001781.34	<p data-bbox="212 332 659 357">#42 Clarification, p. 27; paragraph 1; sentence 4</p> <p data-bbox="212 389 1129 527">“Combining the general plan, existing land use, and 2020 Census data above indicate that in the aggregate, local plans in the SCAG region currently have a remaining physical capacity of roughly 8.2 million housing units—several times higher than anticipated household growth[insert]—but for these additional units to be realized, the existing structures would have to be demolished and replaced with higher density developments[end insert].”</p> <ul data-bbox="212 560 1129 609" style="list-style-type: none"> • The ‘remaining physical capacity’ is only capable of coming to fruition if the existing structures are demolished and replaced. <p data-bbox="212 641 1129 695">[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.
0001781.35	<p data-bbox="212 711 659 735">#43 Clarification, p. 27; paragraph 3; sentence 4</p> <p data-bbox="212 768 1129 881">“The regional growth vision combines an allocation process [insert]rooted in[end insert] [strikeout] based on[end strikeout] Connect SoCal 2020 policies and sustainable growth strategies with a Local Data Exchange [insert]process[end insert] to integrate local [insert]information and [end insert] insights and improve accuracy.”</p> <p data-bbox="212 914 1129 963">[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.
0001781.36	<p data-bbox="212 1060 548 1084">#44 Clarification, p. 27; paragraph 4</p> <p data-bbox="212 1117 1129 1230">“For the purposes of the [insert]preliminary growth forecast and forecasted regional development pattern[end insert] [strikeout] growth vision[end strikeout], PDAs are areas within the SCAG Region where future growth can be located in order to help the region reach mobility or environmental goals.”</p> <p data-bbox="212 1263 1129 1312">[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarification in Comment 0001781.35 (Clarification #43) obviates the need for this additional change.
0001781.37	<p data-bbox="212 1328 548 1352">#45 Clarification, p. 27; paragraph 4</p> <p data-bbox="212 1385 1129 1490">“As such, the regional growth vision aims to increase resilience within the region’s built systems by taking advantage of existing infrastructure, social system by promoting complete communities, economic systems by promoting proximity to jobs, and natural systems by mitigating growth in hazardous or sensitive areas.”</p> <p data-bbox="212 1523 940 1546">Should ‘social system’ be plural and what social system/s is being referred to?</p>	Pluralized. Subsequent reference to Land Use & Communities Technical Report guides reader to SCAG’s definition of “resilience” contained therein, which introduces these concepts in further detail.

ID	COMMENT	RESPONSE
0001781.38	<p data-bbox="212 94 548 115">#46 Clarification, p. 28; paragraph 4</p> <p data-bbox="212 152 1104 228">"This step improved forecast accuracy by linking it to [insert]entitlements and [end insert]likely development sites while also providing an avenue to consider regional strategies and targets in local plans."</p> <p data-bbox="212 266 1083 321">[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.
0001781.39	<p data-bbox="212 332 659 354">#47 Clarification, p. 28; paragraph 4; sentence 2</p> <p data-bbox="212 391 1115 500">"Unlike prior regional plans in which the locally-reviewed employment projection increased while the household projection decreased, local jurisdictions' traditional optimism about employment growth was not only matched but was substantially exceeded by optimism about future housing production."</p> <ul data-bbox="212 532 1104 586" style="list-style-type: none"> • Reword sentence. There are more entitled housing projects and units that are now included in the 2024 RTP; the higher household projection is not just due to optimism. 	Clarified.
0001781.40	<p data-bbox="212 597 533 618">#48 Correction, p. 29; paragraph 1</p> <p data-bbox="212 656 863 677">Change all instances of "PL-94 171" to "P.L. 94-171 Redistricting Data"</p>	Corrected.
0001781.41	<p data-bbox="212 695 659 716">#49 Clarification, p. 31; paragraph 1; sentence 4</p> <p data-bbox="212 753 1045 829">"PUMS data is built by the Census [insert]Bureau[end insert][strikeout] bureau [end strikeout]from hundreds of individual householders' and associated household members' responses to ACS survey questions."</p> <ul data-bbox="212 862 1104 943" style="list-style-type: none"> • Only hundreds of people responded to the PUMS/ACS survey? Clarify if these are hundreds of questions answered by individual householders or hundreds of householders answering questions. <p data-bbox="212 976 1083 1029">[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.
0001781.42	<p data-bbox="212 1040 506 1062">#50 Clarification, p. 33 Table 12</p> <p data-bbox="212 1099 667 1120">Add "(July)" to title to clarify these are July totals.</p>	Added.
0001781.43	<p data-bbox="212 1138 548 1159">#51 Clarification, p. 34; paragraph 3</p> <p data-bbox="212 1196 1104 1273">"The population's age structure and racial/ethnic makeup are expected to continue [insert]their current, gradual pattern of change seen[end insert] [strikeout] to change in ways that they have been gradually changing [end strikeout]in prior decades (Table 5).</p> <p data-bbox="212 1305 1083 1359">[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.

ID	COMMENT	RESPONSE
0001781.44	<p>#52 Clarification, p. 35; paragraph 1; sentence 3</p> <p>“While [strikeout] the non-White [end strikeout][insert]racial/ethnic[end insert] populations [insert]other than non-Hispanic White are[end insert] [strikeout] is [end strikeout]younger, the slower projected rate of total population growth means that most racial/ethnic groups would not see as dramatic share changes as they did in the last thirty years. The largest increases are expected in the [insert] non-Hispanic [end insert] Asian and [insert] non-Hispanic [end insert] two-or-more races populations.”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context.</p>
0001781.45	<p>#53 Clarification, p. 35; paragraph 6; sentence 2+</p> <p>“The top three growth sectors during this time period, in terms of jobs added, are Health Care and Social Assistance sector adding 415[insert],000[end insert] [strikeout] thousand[end strikeout] jobs, Construction sector adding 139[insert],000[end insert] [strikeout] thousand[end strikeout] jobs, and Accommodation and Food Service adding 106[insert],000[end insert] [strikeout] thousand[end strikeout] jobs. Job growth in these three sectors make up half of the projected overall job growth for the region. Sectors where a decrease in jobs is projected between 2022 and 2050 are Finance and Insurance sector of 32[insert],000[end insert] [strikeout] thousand[end strikeout] jobs and a decrease of 16[insert],000[end insert] [strikeout] thousand[end strikeout] jobs in the Administrative and Support and Waste Services sectors.”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Thousands separator added.</p>
0001781.46	<p>#54 Clarification, p. 45; paragraph 6; sentence 2</p> <p>“The Local Data Exchange [insert](LDX)[end insert] process allowed SCAG to harmonize high-level trends with bottom-up community visions[insert] and entitled projects[end insert].”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Clarified.</p>

ID	COMMENT	RESPONSE
0001781.47	<p data-bbox="205 94 1113 207">#55 Clarification, p. 45; paragraph 3 [part 1 of 3] 5.5 TAZ-Level Growth Forecast, Growth Vision, and SCS Consistency Replace section language and corresponding footnote—removing footnote—with the following language:</p> <p data-bbox="205 240 1113 878">“In order to assess the ability of the Connect SoCal 2024 Plan to meet federal air quality standards and achieve a state greenhouse gas reduction target, SCAG creates small-area projections data for housing, population, and employment, which are known as the Tier 2 traffic analysis zone (TAZ) socioeconomic dataset (SED). Although these data are based in part on input provided by staff from local jurisdictions during the Connect SoCal 2024 Local Data Exchange process, local jurisdictions and projects within the region shall not be held to meet any specific numbers within or aggregates of the TAZ data. Connect SoCal 2024’s TAZ-level household and employment projections are created to provide estimated snapshots in time. These projections do not reflect subsequently available information (given that local jurisdictions provided their local input to SCAG between May and December 2022); and, concerning some jurisdictions, they also do not reflect all currently entitled and pending projects. Additionally, the TAZ data do not project the full build-out and realization of localities’ general plans; and they do not conform to jurisdictions’ current respective housing elements. The local plans and approvals have continued and will continue to evolve; and market forces will continue to play a major role in determining the timing, locations, and different types of development and redevelopment that will occur. Therefore, the applicable jurisdiction(s) should be contacted for the most up-to-date data available. The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level. [...]</p>	<p data-bbox="1134 94 2064 175">Consistency language added to Demographics and Growth Forecast Technical Report Section 5.5, Land Use and Communities Technical Report Section 7.5, and Supplementals section of Connect SoCal main book.</p>

ID	COMMENT	RESPONSE
0001781.48	<p>#55 Clarification, p. 45; paragraph 3 [part 2 of 3] [...]</p> <p>SCAG's forecasted regional development pattern (FRDP) is not solely based on the TAZ-level household and employment spatial projections. It is utilized to estimate the overall effect of the many policies, goals, and strategies of Connect SoCal—which should not be uncritically applied, individually or en masse, to any particular project or plan. The TAZ-level household and employment growth projections support the region's ability to model conformity with federal air quality standards and its ability to achieve a state greenhouse gas reduction target; they do not, however, reflect the only set of growth assumptions that may meet these standards and that target.</p> <p>Therefore, insofar as housing and other laws or grants may require comparisons of projects or plans to Connect SoCal 2024, SCAG's projections that are illustrated in TAZ maps—along with any related documents or modeling outputs—may not be used to determine the inconsistency of any plan or project in the region with Connect SoCal 2024. Given that land use decisions are properly made with attention to local contexts and circumstances, local jurisdictions and other lead agencies shall have the sole discretion to determine a local project's or plan's general consistency and overall alignment with Connect SoCal.</p> <p>For example, local jurisdictions' plans and approvals may be found to align with Connect SoCal 2024 if they directionally support a number of its objectives, such as by encouraging a mix of housing types that includes more affordable and multi-family housing rather than solely single-family, for-sale housing; providing for more housing located proximate to employment or vice versa; or encouraging increased use of transit, ridesharing, biking, walking or micro-mobility, or hybrid and remote work to reduce commuting trips. Such alignment is an appropriate basis for a local jurisdiction to determine that a plan or project is consistent with Connect SoCal 2024. Such determinations should be evaluated based on (i) the totality of the goals, policies, and objectives of Connect SoCal 2024 and its associated Program Environmental Impact Report (PEIR), and (ii) the attributes of the local project or plan in overall relation to Connect SoCal, and not in a prescriptive manner by applying SCAG's TAZ-level data, any aggregate thereof, or any particular one or more goals, policies, or objectives of Connect SoCal 2024 and its associated PEIR. [...]</p>	<p>Consistency language added to Demographics and Growth Forecast Technical Report Section 5.5, Land Use and Communities Technical Report Section 7.5, and Supplementals section of Connect SoCal main book.</p>
0001781.49	<p>#55 Clarification, p. 45; paragraph 3 [part 3 of 3] [...]</p> <p>This flows logically from the fact that Connect SoCal 2024 includes dozens of stated directives, policies, goals, objectives, and measurements, any number of which may not be individually applicable to any given project or plan. For example, a project that provides new housing units in conformity with a jurisdiction's approved housing element can and should be found to be in overall alignment with Connect SoCal 2024 given housing production's contribution to Connect SoCal 2024 goals and policies, especially those related to affirmatively furthering fair housing, social and economic justice, jobs-housing balance, and the like.</p> <p>Household or employment growth included in the Connect SoCal 2024 TAZ-level SED and maps may assist in determining consistency with the SCS for purposes of determining a project's eligibility for CEQA streamlining under SB 375 (Cal. Govt. Code § 21155(a)). TAZ-level maps and data may not otherwise be used or applied prescriptively to determine that a project is inconsistent or not in alignment with Connect SoCal 2024 for any purpose, given that myriad other development assumptions could also be found to be consistent or, on balance, aligned with the SCS. Specifically, the TAZ-level data and maps do not supersede or otherwise affect locally approved housing elements, including those adopted in compliance with the 6th Cycle of the Regional Housing Needs Assessment (RHNA)."</p>	<p>Consistency language added to Demographics and Growth Forecast Technical Report Section 5.5, Land Use and Communities Technical Report Section 7.5, and Supplementals section of Connect SoCal main book.</p>

ID	COMMENT	RESPONSE
0001781.50	<p>#56 Clarification, p. 46; paragraph 1</p> <p>“More small households will form as overcrowding pressures ease, particularly during the first half of the Plan [insert]period[end insert][strikeout] horizon[end strikeout].”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Comment noted.
0001781.51	<p>#57 Clarification, p. 46; paragraph 3</p> <p>“While the region showed resilience in the recent recovery from the [insert]COVID[end insert] [strikeout]Covid[end strikeout]-19 [insert]pandemic-related economic downturn[end insert], the pandemic hastened the acceptance of remote work and adoption of technologies that minimize human interaction or that automate work.”</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.
0001781.52	<p>#58 Clarification, p. 48; Map 2 p. 49; Map 3 p. 51; Map 5 p. 52; Map 6 p. 53; Map 7</p> <p>Add language to map and/or map page “Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.”</p>	Map disclaimers added.
Submitted by	Orange County Council of Governments	Submittal 0001782
0001782.01	<p>Table 6: Economic Impact Technical Analysis Technical Report Comments</p> <p>#1, General Comment, All maps</p> <p>All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific technical report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.</p>	There are no maps in the Economic Impact Analysis Technical Report.
0001782.02	<p>#2, General Comment, All pages Add “2024” to all technical report page headers’ titles</p>	Technical report page headers’ titles have been updated to include “2024”.
0001782.03	<p>#3 General Comment, All Pages</p> <p>In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data</p>	Sources have been updated to reference the original data source, where applicable.

ID	COMMENT	RESPONSE
0001782.04	#4, General Comments, All Pages Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.	Comment noted. The text has been updated to capitalize "Plan" where applicable.
0001782.05	#5 General Comment, All Pages For data that is not derived from Connect SoCal models, cite source.	Sources have been updated to reference the original data source, where applicable.
0001782.06	#6, General Comment, All Pages If definitions come from specific source or statute, include the reference in the narrative.	Comment noted. References to specific sources or statutes for a given definition have been updated, where feasible.
0001782.07	#7 General Comment, All Pages Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.	Comment noted. Data on existing and planned infrastructure capacity, such as water and sewer capacity, are not available at the local and neighborhood levels.
0001782.08	#8, General Comment, All Pages Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, otherwise known as "Spheres of Influence" the growth must be feasible	Comment noted.
0001782.09	#9 General Comment Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.	Where applicable, SCAG has added text to tables and graphics to reflect where numbers may not sum due to rounding.
0001782.10	#10 Clarification All Pages Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years. Add notes to language and table or figures that indicate "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming." Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.	Section 3.2 has been modified to include this note.
0001782.11	#11 Correction All Page References and source citations to the American Community Survey dataset should use the word "estimates" not "sample", e.g., "Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates" or for PUMS: "Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021"	This correction is applied.

ID	COMMENT	RESPONSE
0001782.12	<p>#12, General Comment, All Pages</p> <p>Add "2024 Technical Report" to the header of each page</p>	<p>Technical report page headers' titles have been updated to include "2024".</p>
0001782.13	<p>#13, Clarification, p. 2; paragraph 2</p> <p>"In 2023, the economic impacts of Connect SoCal 2024 on the SCAG-region [Strikethrough] SCAG region [Strikethrough ends] economy are at least as important, if not more. The SCAG region is in a similar situation recovering from the economic shock of the response to the COVID-19 pandemic, which upended nearly every aspect of the regional (and global) economy. COVID-19 had unprecedented impacts on the labor market. For example, pandemic-induced workplace closures drastically changed commuting patterns and employment locations. The pandemic response accelerated the decades-long increasing trend of remote and hybrid work, and because of pandemic-induced technological and cultural change, is likely to persist into the foreseeable future (Barrero, Bloom, and David 2023)."</p> <p>(for complete markup, reference table 6)</p>	<p>Comment noted. Replaced "SCAG region" with proper, compound noun "SCAG Region" throughout technical report.</p>
0001782.14	<p>#14 Clarification, p. 2; paragraph 3; sentence 2</p> <p>"The SCAG region has proven resilient in its recovery from the short but sharp COVID-19 recession. Connect SoCal 2024 investments, policies, and strategies strive to be more than the sum of their parts and capture synergies for the Plan. The intent is to fulfill the Plan's vision of a healthy, prosperous, accessible, and connected region for a more resilient and equitable future [endnote i]. Connect SoCal 2024 adds important emerging priorities for the region: a plan that fosters regional resilience, equitable and inclusive economic growth for all SCAG-region [Strikethrough] SCAG region [Strikethrough ends] residents."</p> <ul style="list-style-type: none"> • Use footnotes instead of the single endnote in the document 	<p>Comment noted. Footnote incorporated into text.</p>
0001782.15	<p>#15 Correction, p. 2; paragraph 5; sentence 2</p> <p>"Connect SoCal 2024 details SCAG-region [Strikethrough] SCAG region [Strikethrough ends] transportation spending exceeding \$413 billion..."</p>	<p>Comment noted. Replaced "SCAG region" with proper, compound noun "SCAG Region" throughout technical report.</p>
0001782.16	<p>#16 Clarification p. 3; paragraph 2</p> <p>"Achieving the Plan's promise of economic growth requires us to recognize that the region faces significant income inequality. For example, in 2021, in the SCAG region,</p> <ul style="list-style-type: none"> • Hispanic workers earned 56 percent of White worker wages, • Black workers earned 72 percent of White worker wages, and • Women earned 81 percent of men's wages. (American Community Survey, 2021)" • Is this using median or average wages? • Are the comparisons controlled for years or experience, education or any other factors? 	<p>Comment noted. Wording added to make clear we are reporting average wages from the American Community Survey. In general, "average wages" refers to unconditional averages. No implication is made in the report that reported averages are conditional on any factors.</p>
0001782.17	<p>#17 Clarification, p. 3; second set of bullet points</p> <p>"9.7 percent of the region's households lived in overcrowded housing compared to 7.0 percent for the rest of California and 3.4 percent for the U.S., and</p> <ul style="list-style-type: none"> • Housing costs overburdened 45 percent of the region's households" • Please define 'overcrowded' and include source • Please define 'overburdened' and include source 	<p>Comment noted. Definitions added.</p>

ID	COMMENT	RESPONSE
0001782.18	<p>#18 Clarification p. 5; paragraph 4; sentences 1-2</p> <p>“A mix of transportation projects is planned in the six SCAG counties over the 26-year model timeframe. Of the total Connect SoCal 2024 expenditures exceeding \$413 billion (constant 2023 dollars).”</p> <ul style="list-style-type: none"> • Second sentence is incomplete 	Comment noted. Sentence clarified.
0001782.19	<p>#19, Clarification, “Under the Plan and incorporating the network efficiency gains would increase GDP by \$48 billion (2023 constant dollars) annually, on average.”</p> <ul style="list-style-type: none"> • Sentence structure is awkward. Reword for clarity. 	Comment noted. Clarification made in technical report.
0001782.20	<p>#20 Clarification, p. 14; paragraph 1; last sentence</p> <p>“However, the federal government and California agencies such as CARB and CalTrans rely on the SC-GHG based on the work of the Interagency Working [insert] Group on [insert ended] [striketrough] Group on [end strike]the Social Cost of Greenhouse [insert]Gases[insert ended] [striketrough] Gasses[end strike] (“IWG”). Therefore, for our analysis, we utilized adopt the IWG’s IWG SC-GHG.”</p>	Comment noted. Corrections made in technical report.
0001782.21	<p>#21 p. 14; paragraph 1; sentence 1</p> <p>“The IWG is a group of scientists convened in 2009 by the [insert] federal [insert end] Council of Economic Advisers and the Office of Management and Budget...</p> <p>last sentence</p> <p>However, some damages [insert] are [insert end] difficult to quantify and are omitted from the SC-GHG models, including impacts from increased wildfire...”</p>	Comment noted. Clarification made in technical report.
0001782.22	<p>#22 Clarification p. 16; paragraph 1; sentence 1</p> <p>“In addition to [insert] the [insert end] co-benefit of reduced GHG emissions, vibrant, multi-modal places foster increased physical...”</p>	Comment noted. Clarification made in technical report.
0001782.23	<p>#23, Clarification, p. 17; Table 6</p> <p>Table source: cite original data sources instead of other tables in the report so the table can be extracted and serve as standalone information.</p>	Sources have been updated to reference the original data source, where applicable.
0001782.24	<p>#24 Clarification, p. 17; paragraph 1; sentence 2</p> <p>“However, the SCAG Regional Council adopted the Inclusive Economic Recovery Strategy in July 2021 and, with a grant from the State of California, started implementing strategies for equitable and inclusive economic growth (see Chapter 3 of the [insert] Connect SoCal report [insert end] [striketrough] Main Book)—specifically focusing on racial disparities.”</p>	Comment noted. Clarification made in technical report.

ID	COMMENT	RESPONSE
0001782.25	<p>#25 Clarification, p. 17; paragraph 1; sentence 2</p> <p>"Figure 3 shows that, on average [insert] and not controlling for factors such as field of work, years of experience, or education, [insert end] women earned 81 percent of what men earned in the SCAG region in 2021. [insert] Non-Hispanic [insert end] Black workers earned 72 percent, and Hispanic workers earned 56 percent of [insert] Non-Hispanic [insert end] White, [strikethrough] non-Hispanic [strikethrough end] workers' earnings in the SCAG region in 2021."</p>	<p>Comment noted. The following clarification added to text: "Certainly, differences in education, occupational preferences, and other factors unique to individuals can explain wage differences across individuals. Figure 3 does not control for these factors. However, in a world with equitable treatment of workers, and equitable access to educational and occupational opportunities, we should expect that, on average, workers of all races and genders have the same opportunities. Therefore, observation of large differences in average wages, even without controlling for factors that explain individual differences in wages, is informative as a starting point for this analysis. "</p>
0001782.26	<p>#26, Clarification, p. 18; Figure 3</p> <p>Change Title: " Percent of [insert] Non-Hispanic [insert end] White Worker Wages" Update categories to [insert] Non-Hispanic [insert end] White [insert] Non-Hispanic [insert end] Black/AA Hispanic [insert] Non-Hispanic [insert end] Nat Am [insert] Non-Hispanic [insert end] Asian/PI Other [insert] Non-Hispanic [insert end]</p> <p>"Notes: Based on 2021 American Community Survey 1-Year PUMS Sample. Includes wage and salary workers in the labor force, age 25-64. Excludes observations with labor income below 1st and above 99th percentiles. All races are non-Hispanic. Hispanic includes any race identifying as Hispanic [insert] or Latino." [insert end]</p>	<p>Comment noted. The text is updated for clarity.</p> <p>References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context</p>
0001782.27	<p>#27 Clarification p. 19; paragraph 2; sentence 2 [insert] "For illustrative purposes, assuming [insert end] [strikethrough] Assuming [strikethrough] that this gain in GDP is equally distributed across industries, we can infer that the economic growth from Connect SoCal 2024 transportation investments we computed in Section 3."</p>	<p>Comment noted. Clarification made in technical report.</p>
0001782.28	<p>#28 Clarification p. 18; Figure 3</p> <p>"Notes: Based on data from the 2021 American Community Survey PUMS 1- Year Sample. Includes wage and salary workers in the labor force aged 25-64. Excludes observations with labor income below 1st and above 99th percentiles. All races are non-Hispanic. Hispanic includes any race identifying as Hispanic [insert] or Latino [insert end]. SCAG region GDP estimated at \$1.4 trillion in 2021 (REMI)."</p>	<p>References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context</p>
Submitted by	<p>Orange County Council of Governments</p>	<p>Submittal 0001783</p>
0001783.01.1	<p>Table 7: Equity Analysis Technical Report Comments</p> <p>#1 General Comment, All pages Add "2024" to all technical report page headers' titles</p>	<p>Technical report page headers' titles have been updated to include "2024".</p>
0001783.01.2	<p>#2 General Comment, All pages In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data</p>	<p>Sources have been updated to reference the original data source, where applicable.</p>
0001783.01.3	<p>#3 General Comment, All pages Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.</p>	<p>Comment noted. The text has been updated to capitalize "Plan" where applicable.</p>
0001783.01.4	<p>#4 General Comment, All pages For data that is not derived from Connect SoCal models, cite source.</p>	<p>For data that is not derived from SCAG models, sources have been noted where applicable.</p>

ID	COMMENT	RESPONSE
0001783.01.5	#5 General Comment, All pages If definitions come from specific source or statute, include the reference in the narrative.	Comment noted. References to specific sources or statutes for a given definition have been updated, where feasible.
0001783.01.6	#6 General Comment, All pages Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.	Where applicable, SCAG has added text to tables and graphics to reflect where numbers may not sum due to rounding.
0001783.02	#7 Correction, All pages References and source citations to the American Community Survey dataset should use the word "estimates" not "sample", e.g., "Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates" or for PUMS: "Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021"	This correction is applied.
0001783.03	#8 Table 1: Summary of Performance Measures, p. 4 – 8; Table 1 In the Table 1: Summary of Analysis column, it would be helpful to the reader if the condition(s) reported for all the performance measures, are identified as a condition applicable to either an Existing or Plan timeframe. The approach used in Rail-Related Impacts (page 6) is an excellent approach in distinguishing between Base Year and the Plan. Others are unclear, such as Share of Transportation Usage (page 4), and Bicycle and Pedestrian Collisions (page 5).	The summary of analysis for several performance measures is updated based on this comment. Note that the Share of Transportation System Usage and the Bicycle and Pedestrian Collisions, percent of bicycle/pedestrian High Injury Networks located within Priority Equity Communities performance measures evaluates existing conditions, and therefore does not have a distinction between Existing and Plan conditions. For the most part, the difference can be explained in the distinction between on-going measures and Plan assessment measures as noted in Table 1 and described in Section 4.4 of the Equity Analysis Technical Report.
0001783.04	#9 of Performance Measures: Impacts From Mileage-Based User Fees, p. 8; Table 1 The Summary of Analysis for the "Impacts from Mileage-Based User Fees" states that ".... it is crucial to ensure user fee programs are designed equitable, to insure that vulnerable communities experience the benefits of road pricing without regressive financial impacts." Is there an associated policy recommendation to support this conclusion that should be referenced? In reviewing the Plan Strategies (Section 3.4: Plan Fulfillment), do any of the Regional Planning Policies incorporate this implementation finding? If not, should there be such a policy? The one policy that links closest to the issue is the Funding the System/User Pricing Strategy that states "Study and pilot transportation user-fee programs and mitigation measures that increase equitable mobility." Does "equitable mobility" clearly address tackling regressive financial impacts of any road pricing program to vulnerable communities?	The comment correctly identifies the Implementation Strategy associated with the findings from Section 9.4 of the Equity Analysis Technical Report. The "equitable mobility" in the Funding the System/User Pricing Strategy is referring to targeting benefits and reducing financial burden on vulnerable communities. Sections 9.3 and 9.4 include more nuanced discussions on the regressive nature of transportation funding, so the summary of analysis for the Impacts from Mileage-Based User Fees performance measure is revised from "it is crucial to ensure user fee programs are designed equitably to ensure that vulnerable communities experience the benefits of road pricing without regressive financial impacts" to "it is crucial to ensure user fee programs are designed equitably to ensure that vulnerable communities experience the benefits of road pricing while minimizing financial impacts."
0001783.05	#10 4. Analytical Approach: 4.1 Outreach Efforts Not in Priority Equity Communities, p. 17 There is a subsection bullet listing of what appears to be outreach workshop participant input of what should not be designated as Priority Equity Communities. It would help the reader if the bullet listing could be prefaced with an introductory sentence to provide context, such as "Workshop participants further identified several populations that should not be considered when analyzing equity. These include:" [if this is the correct context]	The list in Section 4.1 of the Equity Analysis Technical Report is updated and sorted to remove subsections and include asterisks on populations that are not currently considered in the methodology to identify Priority Equity Communities. To clarify, the subsection bullet listing includes populations that should be considered when analyzing equity, and the distinction between the two sections is whether or not they are included in the method to identify Priority Equity Communities.
0001783.06	#11 Table 3: Priority Population Descriptions Limited Vehicle and Transit Population, p.21 Table 3 includes a "Limited Vehicle and Transit Population" priority population, and defines this population as "Households with more members than vehicles owned that are not within a census tract that intersects with a High-Quality Transit Corridor." Please clarify if the definition applies to "members of driving age."	The definition of Limited Vehicle and Transit Access does not apply only to household members of driving age. SCAG used American Community Survey Table B08201, Household Size by Vehicles Available to determine vehicle deficit, which is not disaggregated by the individual age of household members at the census tract level. SCAG recognizes this limitation in the data and will be looking for ways to improve this criteria.
0001783.07	#12 Figure 1: Population in Priority Equity Communities by County, p. 22 It would be helpful if Figure 1 also includes a SCAG Region bar of the regional percentage of Priority Equity Population of 48.6%, to provide the reader with immediate visual context of how each county percentage compares to the regional percentage, and avoid having the reader to refer to the preceding paragraph for the context.	Adding the full regional population to Figure 1 would require adding an additional scale, which may confuse readers; in this case, Los Angeles and the SCAG region would appear to be the same size. Instead, SCAG added a text box with the statistic to Figure 1 of the Equity Analysis Technical Report.

ID	COMMENT	RESPONSE
0001783.08	<p>#13 4.4 Impact Assessment, p. 28</p> <p>This section of the Technical Report states that "As described in the Main Book, SCAG conducts a 'Plan' vs 'No Plan' (or Baseline) analysis which compares how the region would perform with and without implementation of Connect SoCal.</p> <p>Please clarify if the reference to Connect SoCal is Connect SoCal 2020 or Connect SoCal 2024, since the use of the phrase has been used in SCAG documents to refer to both the 2020 and the 2024 plan.</p>	<p>Updates are applied to several places in the Equity Analysis Technical Report, including the fourth paragraph of Section 4.4, to clarify which Connect SoCal (2020 or 2024) is referred to in the context of the sentence.</p>
0001783.09	<p>#14 5.1 Comparison of Existing Conditions in the Region and in PECs: Asian population, p. 30-31 Table 7</p> <p>The technical report states that "In contrast, over 60 percent of the region's Hispanic/Latino population Asian population and Native Hawaiian/Pacific Islanders were in Priority Equity Communities." This data does not match with the data in Table 7. Specifically, Table 7 illustrates that the Asian population is at 44.2%. If the Table 7 data is correct, the narrative should delete the reference to Asian populations.</p>	<p>This is an error, should have initially referenced Black, non-Hispanic instead, and is corrected by revisions to the first paragraph of Section 5.1 in the Equity Analysis Technical Report.</p>
0001783.10	<p>#15 5.1 Comparison of Existing Conditions in the Region and in PECs: Average HH Size, p. 30</p> <p>The technical report states that the average household size in Priority Equity Communities is larger than the region. Is there some comparison data that can be provided? This would be helpful, as there is then a subsequent sentence that states only 46.3% of the region's household were in Priority Equity Communities, as compared to 48.6 percent of the total regional population share. Since households are all the members living in a housing unit, is this comparison of value?</p>	<p>The original statement was a conclusion drawn from the inverse relationship between number of households and population in Priority Equity Communities vs. the region. To this sentence we add the average household sizes in PECs and the region so that it reads, "Average household sizes were larger in PECs (3.34) compared to the region (2.99)."</p>
0001783.11	<p>#16 6. Analysis: Mobility Vehicle Ownership, p. 37 & 38 Table 6</p> <p>The technical report, page 37, last paragraph, states that "Figure 6 shows the percentage of householders that do not own an automobile. Almost seven percent of all householders within the SCAG region, and nine percent of householders of color, do not have access to or own a vehicle." Technically, Figure 6 does not illustrate that nine percent of householders of color do not have access to or own a vehicle. Was this an average percentage that was calculated from the raw numbers?</p>	<p>This is an error and is corrected by revising the second to last sentence of the sixth paragraph of Section 6 of the Equity Analysis from "Almost seven percent of all householders within the SCAG region, and nine percent of householders of color, do not have access to or own a vehicle" to "In the SCAG region, about 6.7 percent of all householders, and 7.4 percent of householders of color, do not have access to or own a vehicle." The calculation is based on raw data from U.S. Census Bureau American Communities Survey Public Use Microdata Sample, 2021 5-year estimates.</p>
0001783.12	<p>#17 6.1 Share of Transportation Usage System, p. 40 & 41 Table 10</p> <p>Page 40 of the technical report, last paragraph, states that "Black travelers had the second highest share of bus trips at 18.9%, a rate three times the regional usage, the highest usage rate compared to other racial/ethnic groups."</p> <p>There are some internal inconsistencies within the sentence and with the information on Table 10.</p> <p>a) The sentence makes reference to Black travelers having both the second highest share of bus trips as well as the highest usage rate. Based on the information in Table 10, it appears that the Hispanic/Latino population has the highest bus transit usage.</p> <p>b) If the regional share of bus usage is 2.3%, according to Table 10, how did the report calculate that Black travelers use bus transit at a rate of three times the regional usage? Seems to be much higher than three times.</p>	<p>To clarify the comparison being made, the fourth paragraph of Section 6.1 of the Equity Analysis Technical Report has been revised from "Black travelers had the second highest share of bus trips at 18.9%, a rate three times the regional usage, the highest usage rate compared to other racial/ethnic groups" to "Black travelers had the second highest share of bus trips at 18.9 percent, a rate three times their total system usage, and the highest usage rate (mode share compared to total usage share) compared to other racial/ethnic groups."</p>

ID	COMMENT	RESPONSE
0001783.13	<p>#18</p> <p>6.2 Travel Time and Travel Distance Savings, p.41 & 42 Figure 7</p> <p>6.22 Results, p. 43</p> <p>The Technical Report, page 41, last paragraph, states that "As shown in Figure 7, people of color experience longer travel times and distances using public transportation than auto..." and then continues with certain populations have longer travel time distances than other populations. Page 43: Results, third paragraph, continues to identify comparisons by race and ethnicity for public transportation.</p> <p>a) In reviewing the data on the referenced Figure 7, is the "Bus, Rail, Taxi or Ferry" category for commute times the same as "public transportation"? If that is correct, please also label as "Public Transportation: Bus, Rail, Taxi or Ferry."</p> <p>b) In reviewing the data on the referenced Figure 7, is the "Car or Motorcycle" category for commute times the same as "auto"? If that is correct, please also label as "Auto" so the narrative matches the Figure.</p> <p>c) If Public Transportation represents those four categories: Bus/Rail/Taxi/Ferry, the narrative/conclusions on pages 41 and 43 do not seem to match up with the data in Figure 7. Please re-review and appropriately correct.</p>	<p>The text in Section 6.2 of the Equity Analysis Technical Report is revised to clarify the groupings of transportation modes that are referred to in Figure 7 with data sourced from U.S. Census Bureau American Communities Survey Public Use Microdata Sample. The text in Section 6.2.2 is referencing the analysis from SCAG's Travel Demand Model, as displayed in Figures 8 to 12 and Maps 2 to 4. The difference in definitions for public transit and auto are explained by the different surveys used in each analysis.</p>
0001783.14	<p>#19 6.3 Access to Everyday Destinations: Travel Cost Threshold, p. 52</p> <p>The Equity Technical Report identifies that it uses a "Travel Cost Threshold" as a metric to measure access to destinations. The narrative on page 52 would benefit from a definition and explanation of a travel cost threshold, to set the context for the information in Table 11: Survey of Metrics for Access to Everyday Destinations.</p>	<p>The fourth paragraph of Section 6.3 of the Equity Analysis Technical Report is revised to include the following to define travel cost thresholds: "Travel cost thresholds are the time or distance thresholds that used to evaluate access. The assumption is that the lower the costs of travel in terms of time and money, the more places that can be reached within a certain budget and, thus, the greater the level of accessibility for residents of a particular neighborhood."</p>
0001783.15	<p>#20 7. Analysis: Communities, p. 77 & 78 Figure 24</p> <p>The narrative on page 77, last paragraph, states that Figure 24 (on page 78) identifies households without broadband access. Further, that Black households (4.3%) are most likely to not own a computer. When looking at the percentages in the referenced Figure 24, the figure is labeled as "people living in households". Please clarify if the percentages shown in Figure 24 are the number of households (which can be occupied by more than one person), or the percentage of the total population living in those households (i.e., number of households multiplied by an average population per unit factor).</p>	<p>This is an error and is corrected by revising the third to last paragraph of Section 7 of the Equity Analysis to clarify that the statistic used in Figure 24 is referring to individuals, not households. "In Figure 24, households without broadband access are defined as ... Black households (4.3 percent) are most likely to not own a computer. Asian, Multiracial, and White households ..." is changed to "In Figure 24, people without broadband access are defined as ... Black people (4.3 percent) are most likely to not own a computer. Asian, Multiracial, and White populations ..."</p>
0001783.16	<p>#21 7.3.2 Rail-Related Impacts Results, p. 96</p> <p>The conclusion on rail-related impacts seems to be vague on explicitly explaining the impacts of populations living proximate to railroads and railyards between Baseline and the Plan (e.g., "SCAG anticipates nominal plan impact or small differences between the Baseline and Plan scenarios, and that population changes would generally follow that of the SCAG region.")</p> <p>From an equity perspective, does this section address if the existing Baseline condition is a problem and needs to be addressed, especially if the conclusion is that there will be no significant change with implementation of the Plan?</p>	<p>Section 7.3.2 of the Equity Analysis Technical Report does disclose the disproportionate impact of rail-related impacts on some people of color and low income households in the Existing, Baseline, and Plan conditions. The fourth paragraph discusses how SCAG recognizes and is addressing these impacts, including the recent Southern California Goods Movement Communities Opportunities Assessment, which provides best practices suggested for local communities to implement.</p> <p>One sentence is added to the last paragraph to note another opportunity SCAG is taking to address the existing freight-associated issues, which states "In addition, SCAG intends to update the Comprehensive Sustainable Freight Plan and ensure that communities affected by freight impacts are involved in the planning process."</p>
0001783.17	<p>#22 9.2.2 Investments vs Benefits: Results, p. 135 Figure 43</p> <p>The technical report identifies that Figure 43 illustrates that the Connect SoCal 2024 investments in projects most used by Hispanic/Latino and Asian populations are lower compared to people of other races and ethnicities. Is this an equity issue that warrants greater discussion? Leaves the reader hanging.</p>	<p>To provide greater discussion on the results of Section 9.2 of the Equity Analysis Technical Report, Figure 43 is revised to include average system usage over the same period of the investments (2019 to 2050). The last paragraph of Section 9.2.2 is revised to include a greater and more nuanced discussion of the issue of investments vs. benefits.</p>

ID	COMMENT	RESPONSE
0001783.18	<p data-bbox="212 94 1115 180">#23 9.4 Impacts from Mileage-Based User Fee, p. 142 10. Equity Resources for Action Toolbox: 10.4.5 Road Pricing Programs, p. 171</p> <p data-bbox="212 207 1115 488">The last paragraph on page 142 states that a Community Advisory Committee "expressed skepticism about road pricing as a pathway to more equitable transportation." This needs to be expanded and summarized as to the concerns expressed by the Community Advisory Committee. If there is skepticism to the equity of road pricing, the technical report should flush out what the concerns were, and whether the three recommended bullet points for pricing-related advocacy, effectively eliminates the fundamental issue or if it still remains. This issue then carries over into the Equity Toolbox: 10.4.5 Road Pricing Programs, which recommends that local agencies and groups "Adjust mitigation of negative impacts on vulnerable communities to reflect the specific impacts of pricing programs and local conditions." This is very vague and unclear and warrants expansion and context narrative.</p>	<p data-bbox="1136 94 2055 310">Comment noted. The equity issues raised by the Community Advisory Committee are fully explored in the 2022 Mobility Innovations and Pricing Report, as cited in Section 9.4 of the Equity Analysis Technical Report. SCAG's understanding is that addressing the three issues outlined would be good progress, but these are not the only concerns, as noted by the "including but not limited to" language. Continued connection and coordination on road pricing programs with community and agency partners would be required to continue moving toward equitable outcomes.</p> <p data-bbox="1136 321 2055 456">The Equity Resources for Action Toolbox, Section 10.4.5 of the Equity Analysis Technical Report is revised from "Adjust mitigation of negative impacts on vulnerable communities to reflect the specific impacts of pricing programs and local conditions" to "Incorporate Program Design and Reinvestment Strategies suggested in Part III of the Mobility Innovations and Pricing Report to minimize negative impacts on vulnerable communities."</p>
Submitted by	Orange County Council of Governments	Submittal 0001784
0001784.01	<p data-bbox="212 545 1115 570">Table 8: Goods Movement Technical Report Comments</p> <p data-bbox="212 602 1115 659">#1 General Comment, All pages Add "Technical Report" and "2024" to all technical report page headers' titles</p>	<p data-bbox="1136 545 2055 570">Technical report page headers' titles have been updated to include "2024".</p>
0001784.02	<p data-bbox="212 675 1115 699">#2 General Comment, All pages</p> <p data-bbox="212 708 1115 813">In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data</p>	<p data-bbox="1136 675 2055 699">Sources have been updated to reference the original data source, where applicable.</p>
0001784.03	<p data-bbox="212 829 1115 854">#3 General Comment, All pages</p> <p data-bbox="212 862 1115 902">Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.</p>	<p data-bbox="1136 829 2055 854">Comment noted. The text has been updated to capitalize "Plan" where applicable.</p>
0001784.04	<p data-bbox="212 919 1115 943">#4 General Comment, All pages</p> <p data-bbox="212 951 1115 976">For data that is not derived from Connect SoCal models, cite source.</p>	<p data-bbox="1136 919 2055 943">Sources have been updated to reference the original data source, where applicable.</p>
0001784.05	<p data-bbox="212 992 1115 1016">#5 General Comment, All pages</p> <p data-bbox="212 1024 1115 1040">If definitions come from specific source or statute, include the reference in the narrative.</p>	<p data-bbox="1136 992 2055 1040">Comment noted. References to specific sources or statutes for a given definition have been updated, where feasible.</p>
0001784.06	<p data-bbox="212 1057 1115 1081">#6 General Comment, All pages</p> <p data-bbox="212 1089 1115 1138">Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</p>	<p data-bbox="1136 1057 2055 1138">Comment noted. Data on existing and planned infrastructure capacity, such as water and sewer capacity, are not available at the local and neighborhood levels.</p>
0001784.07	<p data-bbox="212 1154 1115 1179"># General Comment, All pages</p> <p data-bbox="212 1187 1115 1235">Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.</p>	<p data-bbox="1136 1154 2055 1235">Where applicable, SCAG has added text to tables and graphics to reflect where numbers may not sum due to rounding.</p>
Submitted by	Orange County Council of Governments	Submittal 0001785
0001785.01.1	<p data-bbox="212 1292 1115 1317">Table 9: Housing Technical Report Comments</p> <p data-bbox="212 1349 1115 1406">#1 General Comment, All pages Add "Technical Report" and "2024" to all technical report page headers' titles</p>	<p data-bbox="1136 1292 2055 1317">Technical report page headers' titles have been updated to include "2024".</p>
0001785.01.2	<p data-bbox="212 1422 1115 1446">#2 General Comment, All pages</p> <p data-bbox="212 1455 1115 1552">In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data</p>	<p data-bbox="1136 1422 2055 1446">Sources have been updated to reference the original data source, where applicable.</p>

ID	COMMENT	RESPONSE
0001785.01.3	#3 General Comment, All pages Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.	Comment noted. The text has been updated to capitalize “Plan” where applicable.
0001785.01.4	#4 General Comment, All pages For data that is not derived from Connect SoCal models, cite source.	Sources have been updated to reference the original data source, where applicable.
0001785.02.1	#5 General Comment, All pages If definitions come from specific source or statute, include the reference in the narrative.	Comment noted. References to specific sources or statutes for a given definition have been updated, where feasible.
0001785.02.2	#6 General Comment, All pages Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.	Comment noted. Data on existing and planned infrastructure capacity, such as water and sewer capacity, are not available at the regional level. Instead, SCAG works with local jurisdictions through the Local Data Exchange (LDX), further described in Section 5.5 in the Land Use and Communities Technical Report, to integrate considerations of infrastructure capacity into the Forecasted Regional Development Pattern.
0001785.02.3	#7 General Comment, All pages Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.	Comment noted. Data on existing and planned infrastructure capacity, such as water and sewer capacity, are not available at regional levels.
0001785.02.4	#8 General Comment, All pages Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.	Where applicable, SCAG has added text to tables and graphics to reflect where numbers may not sum due to rounding.
0001785.03	#9 Clarification, All pages Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years. Add notes to language and table or figures that indicate “not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming.” Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.	Comment noted. The Plan's farmland data was obtained from the California Department's Farmland Mapping & Monitoring Program (FMMP), which classifies farmland by use and quality, not zoning designation. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. For more information, please see https://www.conservation.ca.gov/dlrp/fmmp .
0001785.04	#10 Correction, All pages References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”	This correction is applied.
0001785.05	#11 General Comment, All pages Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of “non-Hispanic” even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White...	References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context.

ID	COMMENT	RESPONSE
0001785.06	<p>#12 Clarification, p. 1; paragraph 3; last sentence "This report focuses on housing need and strategies that can support housing production and is complemented by the Land Use and Communities Technical Report which guides where and how development, including housing, [insert] may [end insert] [strikeout] should [end strikeout] occur in the region in [insert] a way that is in [end insert] alignment with Connect SoCal 2024."</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for noted edits.]</p>	Comment noted. Change not recommended.
0001785.07	<p>#13 Clarification p. 1; paragraph 4 p. 2 1. Executive Summary Existing Housing Need 2. Why Housing Matters</p> <p>Page 1, fourth paragraph, discusses the current housing crisis and includes the statement that "A shortfall of housing to meet the needs of the SCAG region have created issues such as cost-burden and overcrowded households." As has been discussed during the 6th cycle RHNA process, one factor for the significant increase in the SCAG region's 6th cycle housing need number – as determined by State HCD – is a shortfall of housing to meet the housing needs of the existing population. This existing housing need number was then added to State HCD's calculation of the region's future housing need for future population for the State's 6th RHNA cycle. A discussion and clarification of existing housing need is recommended to be added to the Executive Summary and to Section 2: Why Housing Matters, to enable the reader to understand why there is a backlog of housing need.</p>	Comment noted. More in-depth discussion and clarification on existing housing need is provided in the Housing Technical Report.
0001785.08	<p>#14 Clarification p. 1; paragraph 5 1. Executive Summary Barriers to Housing Production</p> <p>Page 1, paragraph 5, discusses barriers to housing production, which include "lack of resources, community opposition, increasing construction costs, and the fiscalization of land use...". a) For the layperson, an explanation of "fiscalization of land use" would be recommended. b) Also, other factors that challenge housing production include: insufficient funding that can be provided to developers, to help subsidize the cost of building affordable housing units, especially with the elimination of state redevelopment funds; and, conflicting state requirements over housing production versus coastal lands protection on lands governed by the California Coastal Commission. While the sixth paragraph states that "Funding is available from the State to implement plans and projects at the regional and local levels," this sentence downplays the extent of funding needed to assist in housing production.</p>	<p>a) Explanation and more in-depth discussion on fiscalization of land use is provided in the Housing Technical Report.</p> <p>b) A list and in-depth discussion of various factors that challenge housing production, including funding challenges, is provided in the Housing Technical Report.</p>
0001785.09	<p>#15 Clarification, p. 1; paragraph 6; last sentence "Long term SCAG implementation strategies include providing technical assistance to housing element implementation, aligning housing-supportive infrastructure, and continuing its outreach and education efforts." • What is 'aligning housing-supportive infrastructure'?</p>	The sixth paragraph in Section 1. Executive Summary is changed to read, "Long term SCAG Implementation Strategies include providing technical assistance to housing element implementation, coordinating infrastructure projects that support housing, and continuing its outreach and education efforts."
0001785.10	<p>#16 Clarification, p. 2; paragraph 3; sentence 2 "However, while its core function was to insure home mortgage loans made by banks and private lenders, the FHA refused to insure mortgages in Black neighborhoods, often forcing them to move into urban housing projects and [insert] rendering them [end insert] unable to build generational wealth that accompanies homeownership."</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for noted edits.]</p>	The third paragraph in Section 2. Why Housing Matters is changed to read, "However, while its core function was to insure home mortgage loans made by banks and private lenders, the FHA refused to insure mortgages in Black neighborhoods, often forcing them to move into urban housing projects and rendering them unable to building generational wealth that accompanies homeownership."

ID	COMMENT	RESPONSE
0001785.11	<p>#17 Clarification, p. 2; paragraph 5; sentence 2 "Even in neighborhoods where people of color found housing, [insert] some [end insert] urban renewal policies destroyed [insert] some [end insert] existing communities and displaced their residents." [See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for noted edits.]</p>	Comment noted.
0001785.12	<p>#18 Clarification, p. 2; paragraph 6; sentence 1 "Today, the quantitative impacts of the housing crisis such as overcrowding, cost-burden, and [insert] low [end insert] home ownership, disproportionately burden communities of color." [See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for noted edits.]</p>	The sixth paragraph in Section 2. Why Housing Matters is changed to read, "Today, the quantitative impacts of the housing crisis such as overcrowding, cost-burden, and low homeownership disproportionately burden communities of color."
0001785.13	<p>#19 Clarification p. 3; paragraph 2 2. Why Housing Matters The last paragraph of the "Why Housing Matters" section states that the Technical Report does not specifically define a quantitative threshold for what constitutes affordable housing. Nonetheless, there should be an additional sentence that identifies that the SCAG region jurisdictions, as a whole, must plan for more than 40% of its RHNA housing to be affordable to Extremely Very Low, Very-Low and Low Income households, per the 6th cycle RHNA allocation. This is an important context for the reader to understand, especially when addressing the challenges of housing production.</p>	Comment noted. This specific sentence refers to the technical report and the usage of the word affordable in the report.
0001785.14	<p>#20 Clarification, p. 3; paragraph 5; 3.1 Local General Plans and Housing Elements This section, third paragraph, states that "Jurisdictions are required to update their housing elements to demonstrate how they would accommodate future housing need by preparing a sites inventory." As noted in the earlier comment, housing need comprises both existing and future housing needs. Please clarify in the above-referenced statement.</p>	The third paragraph in Section 3.1 Local General Plans and Housing Elements is changed to read, "Jurisdictions are required to update their local housing element to demonstrate how they would accommodate existing and future housing need by preparing a sites inventory."
0001785.15	<p>#21 Clarification, p. 3; paragraph 5; sentence 3 "In addition to the sites inventory, the housing element must identify existing and special housing needs, such as units at-risk for conversion, overcrowding and cost-burden households, population and household characteristics, seniors, and people experiencing homelessness." • Use semicolons to clarify meaning: "In addition to the sites inventory, the housing element must identify existing and special housing needs, such as units at-risk for conversion[insert];[end insert] overcrowding and cost-burden households[insert];[end insert] population and household characteristics[insert];[end insert] seniors[insert];[end insert] and people experiencing homelessness." [See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for noted edits.]</p>	Comment noted.
0001785.16	<p>#22 Clarification, p. 4; paragraph 1 3.2 RHNA Local COG This section, first paragraph, states that "The [RHNA] allocation for each jurisdiction is developed by a local Council of Governments (COG) such as SCAG." Is a "local" COG an accurate description of SCAG, or is "regional" a more appropriate descriptor?</p>	The first paragraph in Section 3.2 Regional Housing Needs Allocation is changed to read, "The allocation for each jurisdiction is developed by a Council of Governments (COG) such as SCAG."

ID	COMMENT	RESPONSE
0001785.17	<p>#23 Clarification p. 4; paragraph 1; sentence 4 "The RHNA process is repeated every eight years to ensure that the State's housing needs are being [insert] addressed[end insert] [strikeout]met [end strikeout]and coincides with the housing element update period."</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for noted edits.]</p>	Comment noted.
0001785.18	<p>#24 Clarification, p. 5; paragraph 1; sentence "Meanwhile, these factors strengthen SCAG's Connect SoCal regional strategies of growth near destinations and mobility options. [Insert] These strategies include [end insert] [strikeout] such as [end strikeout] emphasizing land use patterns that facilitate multimodal access to work, educational and other destinations and prioritizing infill and redevelopment of underutilized land to accommodate new growth and increasing amenities and connectivity in existing neighborhoods."</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for noted edits.]</p>	Comment noted.
0001785.19	<p>#25 Clarification, p. 5; paragraph 2 "The [Insert] 6th cycle [end insert] [strikeout] final [end strikeout] RHNA plan was adopted by SCAG in March 2021."</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for noted edits.]</p>	The fifth paragraph in Section 3.2 Regional Housing Needs Allocation is changed to read, "The 6th cycle final RHNA plan was adopted by SCAG in March 2021."
0001785.20	<p>#26 Clarification, p. 5; paragraph 3 "Together with the General Plan and housing element, the RHNA allocation is a vision of a local jurisdiction's household need and the ways to accommodate its existing and future need while achieving its goals." • Clarify who and what goals is being referred to at the end of the sentence.</p>	The sixth paragraph in Section 3.2 Regional Housings Needs Allocation is changed to read, "Together with the General Plan and housing element, the RHNA allocation is a vision of a local jurisdiction's household need and the ways to accommodate its existing and future need while simultaneously achieving the jurisdiction's goals."
0001785.21	<p>#27 Clarification p. 5, 6 4 Existing Conditions</p> <p>This section, first paragraph, states that "An analysis of existing conditions for the region's housing characteristics provides insight on housing trends, helps identify housing issues communities are facing, and predicts the future needs of the region." How does an existing conditions analysis predict future needs? Please provide a clarifying example or eliminate the reference. The last sentence of Section 4 (on page 6) is perhaps a more appropriate descriptor: "Evaluating the region's housing existing conditions helps SCAG understand the challenges the region is facing to develop implementation strategies and policies to alleviate these challenges moving forward."</p>	The first paragraph of Section 4. Existing Conditions is changed to read, "An analysis of existing conditions for the region's housing characteristics provides insight on housing trends, helps identify housing issues communities are facing, and helps determine housing needs of the region."

ID	COMMENT	RESPONSE
0001785.22	<p>#28 Clarification, p. 6; paragraph 2</p> <p>“[insert] According to [insert agency data is sourced from], as of 20xx, the [end insert] [strikeout] The [end strikeout] SCAG region [insert] has [end insert] [strikeout] hosts [end strikeout] a total of 6,622,509 units in its housing stock. Over half of these units were built before 1980, approximately over 40 years ago. The SCAG region follows California’s trend of increasing housing production until 1980 when housing production [insert] began [end insert] [strikeout] begins [end strikeout] to decrease [strikeout] dramatically [end strikeout] each year thereafter, which has led to a housing shortage (Figure 1). Moreover [insert],[end insert] Senate Bill 375 (SB 375) became law in 2008, but since then, only 5 percent of total housing stock has been built. While this indicates that growth in housing supply has been slower than anticipated, it also indicates a significant barrier to realizing the vision of SB 375 as the only way to get more housing near transit is to also have more housing overall.”</p> <p>In last sentence, why is housing supply ‘slower than anticipated’? Sentence is unclear, please reword.</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for noted edits.]</p>	<p>The first paragraph of Section 4.1 is changed to read, "The SCAG region hosts a total of 6,622,509 units in its housing stock (Figure 1). Over half of these units were built before 1980, approximately over 40 years ago. The SCAG region followed California’s trend of increasing housing production until 1980 when housing production began to decrease dramatically each year thereafter, which has led to a housing shortage."</p> <p>SB 375 aims to use the regional transportation process to achieve reductions in greenhouse gas emissions. To encourage projects in line with the RTP through CEQA incentives and to coordinate the RHNA process while maintaining local authority over land use decisions, housing production overall, and particularly housing near transit, was expected to rise.</p>
0001785.23	<p>#29 Clarification, p. 6; paragraph 2; last sentence 4.1 Housing Stock SB 375 reference</p> <p>"...realizing the vision of SB 375 ... to get more housing near transit, is to have more housing overall."</p> <p>The directive of SB 375 is to reduce greenhouse gas emissions through a complement of land use planning and transportation investments. Please provide a statute citation that documents that SB 375 calls for having more housing overall in order to have more housing near transit.</p>	<p>Comment noted, the following language will be deleted from text:</p> <p>Moreover Senate Bill 375 (SB 375) became law in 2008 but since then, only 5 percent of total housing stock has been built. While this indicates that growth in housing supply has been slower than anticipated, it also indicates a significant barrier to realizing the vision of SB 375 as the only way to get more housing near transit is to also have more housing overall.</p>
0001785.24	<p>#30 Clarification, p. 6; paragraph 3</p> <p>“[strikeout] Geographically in the SCAG region, as [end strikeout] [insert] As [end insert] housing production continued to [insert] decrease [end insert] [strikeout] dwindle [end strikeout] in Los Angeles County, housing production stayed strong in the Inland Empire, which encompasses Riverside and San Bernardino Counties. Determining where housing is needed is a major [strikeout] geographical [end strikeout] challenge. Housing production is needed across the region, and in addition to infill areas and other urban locations, housing is still needed in less dense and connected areas. The underproduction of housing has had negative [insert] impacts [end insert] [strikeout] implications [end strikeout] on people throughout the region, leading to overcrowding and additional cost burden that disproportionately affect communities of color.</p> <p>Figure 1. SCAG [insert] Counties’ [end insert] [strikeout] Counties [end strikeout] 2021 Housing Stock”</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The second paragraph in Section 4.1 Housing Stock is changed to read, "As housing production continued to decrease in Los Angeles County, housing production stayed strong in the Inland Empire, which encompasses Riverside and San Bernardino Counties. Determining where housing is needed is a major challenge. Housing production is needed across the region, and in addition to infill areas and other urban locations, housing is still needed in less dense and connected areas. The underproduction of housing has had negative impacts on people throughout the region, leading to overcrowding and additional cost burden that disproportionately affect communities of color.</p> <p>The title of Figure 1 is changed to read, "SCAG Counties' 2021 Housing Stock by Year Structure Built".</p>

ID	COMMENT	RESPONSE
0001785.25	<p data-bbox="191 87 485 207">#31 Clarification p. 7; paragraph 1; sentence 2 4.1 Housing Stock Housing Built before 1990</p> <p data-bbox="191 228 1094 349">Page 7, first paragraph, makes an argument that living in a home built before 1990, "when combined with other conditions such as substandard facilities, cost burden, overcrowding and housing [insert]under[end insert]production ... results in a scenario where the region is not meeting the housing needs of who is already here in the region."</p> <ul data-bbox="191 354 1129 548" style="list-style-type: none"> • Please provide a citation of source of this conclusion that housing structure age is a key determinant of why the region is not meeting its existing housing need. • And further, how the age of a housing structure "results in a scenario of disproportionate burden and inequity." • In looking at the Section 4.3: Complete Facilities narrative on pages 10-11, there is no discussion or presentation of data about the age of the housing structure as it relates to the units inventoried as lacking kitchen or plumbing facilities. <p data-bbox="191 570 1062 597">[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p data-bbox="1121 87 2066 228">Comment noted. The following language deleted from document "While older housing stock does not indicate an equity issue on its own, combined with other conditions such as substandard facilities, cost burden, overcrowding, and housing production, it results in a scenario where the region is not meeting the housing needs of who is already here in the region. Combined with data on communities of color, it results in a scenario of disproportionate burden and inequity."</p>
0001785.26	<p data-bbox="191 634 485 695">#32 Clarification, p. 7; paragraph 2; sentence 3</p> <p data-bbox="191 716 1083 836">"In every county [insert] in the SCAG region, [end insert] there are more homeowners than renters, except for Los Angeles County which has a 55 percent renter-occupied housing rate. However, a look at housing tenure among communities of color reveals an inequitable distribution of homeownership."</p> <p data-bbox="191 857 1062 889">[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p data-bbox="1121 634 2066 716">The first paragraph in Section 4.2 Housing Tenure is changed to read, "In every county in the SCAG region, there are more homeowners than renters, except for Los Angeles County, which has a 55 percent renter-occupied housing rate."</p>
0001785.27	<p data-bbox="191 894 485 954">#33 Clarification, p. 7; paragraph 3; sentence 3</p> <p data-bbox="191 976 1115 1161">Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of "non-Hispanic" if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly.</p> <p data-bbox="191 1166 1129 1351">For example: "According to SCAG's 2022 Racial Equity Baseline Conditions Report, 61 percent of [insert] non-Hispanic [end insert] White households owned their home compared to only 58 percent of [insert] non-Hispanic [end insert] Asian/Pacific Islander households, 44 percent of Hispanic ([insert] or [end insert] Latino) households, 36 percent of non-Hispanic Black households, and 47 percent of [insert] non-Hispanic [end insert] Native American households. This means that [insert] non-Hispanic [end insert] White household homeownership is nearly twice the rate of [insert] non-Hispanic [end insert] Black households."</p> <p data-bbox="191 1372 1062 1411">[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p data-bbox="1121 894 2066 927">Comment noted. Category labels come from Census data.</p> <p data-bbox="1121 948 2066 1040">References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context.</p>

ID	COMMENT	RESPONSE
0001785.28	<p>#34 Clarification Figure 5 4.2 Housing Tenure By Race & Ethnicity</p> <p>When discussing home ownership by race and ethnicity, the narrative on page 7 cites SCAG's 2022 Racial Equity Baseline Conditions Report, while Figure 5 cites U.S. Census Bureau data. The use of two cited sources results in homeownership percentage figures that are close but not consistent.</p> <ul style="list-style-type: none"> • Please specify whether the racial/ethnic categories are all for non-Hispanic groups other than Hispanic (or Latino); if so, add "non-Hispanic" to categories other than Hispanic/Latino. 	<p>The second paragraph in Section 4.2 Housing Tenure removes references to SCAG's 2022 Baseline Conditions Report and reflects data from Figure 5.</p> <p>References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context.</p>
0001785.29	<p>#35 Clarification p. 10 4.3 Complete Facilities</p> <p>This section, first paragraph, states that "there are still 80,909 units lacking complete kitchen facilities and 22,282 units lacking complete plumbing facilities in the SCAG region."</p> <ul style="list-style-type: none"> • Please also include the total number of housing units in the SCAG region, to provide context on the extent of substandard units. • Cite source and year of data. • Note that JADUs do not require a separate bathroom but are considered a housing unit. • The U.S. Census Bureau counted thousands of additional housing units in the SCAG region that were not estimated by State DOF or reported by cities and counties as officially permitted units. Many of these are presumed to be non-traditional living quarters and may not have full kitchen or plumbing. The Bureau states that "Even tents, old railroad cars, and boats are considered to be living quarters if someone claims them as his or her residence." (page B-8 https://www2.census.gov/programs-surveys/decennial/2020/technical-documentation/complete-tech-docs/summary-file/2020Census_PL94_171Redistricting_StatesTechDoc_English.pdf) If people were living in these structures/objects at the time of the 2020 Census, these were counted as 'housing units' and reported in the 2020 Census housing count that is used as a benchmark by DOF and most agencies. 	<p>Comment noted. The total number of SCAG housing units is stated under Section 4. Housing Stock.</p> <p>All figures list data sources underneath each figure. Figure 7 is changed to read housing units instead of households.</p> <p>Junior Accessory Dwelling Units (JADUs) are not considered as part of substandard housing units.</p> <p>Living quarters are not interchangeable with housing units. Analysis using a different definition in this section would not change the narrative.</p>

ID	COMMENT	RESPONSE
0001785.30	<p data-bbox="205 94 388 147">#36 Clarification p. 10; paragraph 2</p> <p data-bbox="205 180 1123 342">Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of “non-Hispanic” if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly.</p> <p data-bbox="205 375 1123 878">For example: “This issue becomes more pronounced when analyzing rates among communities of color and comparing them to [insert] non-Hispanic [end insert] White communities and regional averages. SCAG’s 2022 Racial Equity Baseline Conditions Report found that in the SCAG region, [insert] non-Hispanic [end insert] Native Americans and [insert] non-Hispanic [end insert] Black residents are three times more likely to live in housing units without plumbing facilities than [insert] non-Hispanic [end insert] White households (1.1 percent, 0.7 percent, and 0.3 percent, respectively). Across the region, 1.4 percent of [insert] non-Hispanic [end insert] White residents live in housing units without complete kitchen facilities, compared to 2.0 percent for [insert] non-Hispanic [end insert] Native Americans and 1.8 percent for [insert] non-Hispanic [end insert] Asians/Pacific Islanders. This inequity is particularly apparent in rural Imperial County, where one out of every 20 [insert] non-Hispanic [end insert] Black residents (about 5 percent) live in housing units without complete kitchen facilities, which is significantly higher than the overall county rate of 0.9 percent. A similar trend is found in Ventura County where 3.1 percent of [insert] non-Hispanic [end insert] Black people live without kitchen facilities compared to [insert] non-Hispanic [end insert] White people at 1.2 percent.⁶ The disproportionate rates of substandard housing in communities of color compared to [insert] non-Hispanic [end insert] White communities and the overall average suggest that the production of more housing in these communities, especially in rural and non-infill areas, can address historical disparities.”</p> <p data-bbox="205 911 1060 938">[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p data-bbox="1136 94 2066 175">References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context.</p>
0001785.31	<p data-bbox="205 954 430 1036">#37 Clarification p. 11, Figure 8 4.3 Complete Facilities</p> <p data-bbox="205 1068 1123 1149">a) Figure 8 does not have any bar illustrating the percentage of White households that lack kitchen and plumbing facilities. Is the first “Other” bar incorrectly labeled, and should be the “White” bar at 0.19%?</p> <p data-bbox="205 1182 1123 1344">b) Also, there is no discussion about the information in Figure 8, in the narrative. The narrative cites SCAG’s 2022 Racial Equity Baseline Conditions Report, where the lack of kitchen facilities is independently quantified from the lack of plumbing facilities. Figure 8, on the other hand, tabulates the percentage of households (by race and ethnicity) lacking kitchen and plumbing facilities combined and not separately. As a result, the percentage numbers between the narrative and Figure 8 do not match.</p> <p data-bbox="205 1377 1123 1429">c) Please specify whether the racial/ethnic categories are all for non-Hispanic groups other than Hispanic (or Latino); if so, add “non-Hispanic” to categories other than Hispanic/Latino.</p>	<p data-bbox="1136 954 2066 1003">Figure 8 is updated to reflect correct category labels and for consistency with Equity Analysis Technical Report.</p> <p data-bbox="1136 1036 2066 1084">Removed reference of SCAG’s 2022 Baseline Conditions Report and updated text to reflect Figure 8.</p> <p data-bbox="1136 1117 2066 1203">References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context</p>

ID	COMMENT	RESPONSE
0001785.32	<p>#38 Clarification p. 12; paragraph 1; sentence 3 "Households that spend more than 30 percent of their income on housing are considered [insert] cost burdened [end insert] [strikeout] "overpaying" [end strikeout] and will have less income to spend on both essential needs, such as food and transportation, and discretionary purchases." • "overpaying" is not the same as "cost-burdened"- overpaying is associated with the cost of the rent, not the share of income being paid on rent.</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The first paragraph in Section 4.4 Cost Burdened Households is changed to read, "Households that spend more than 30 percent of their income on housing are considered cost burdened and will have less income to spend on both essential needs, such as food and transportation, and discretionary purchases."</p>
0001785.33	<p>#39 Clarification p. 12, 13 Figure 9 Figure 10 4.4 Cost Burdened Households 2012, 2019, 2021</p> <p>This section discusses the percentage of cost burdened households, across several referenced years (2012, 2019 and 2021). However, the percentages cited in the narrative, do not match the information in Figure 9 or Figure 10. Please re-review and correct. One issue could be that the narrative separates a discussion of renters versus owners, whereas the Figures could possibly be a combination of all households (i.e., renters and owners). However, the discussion relating to all households (renters and owners) on page 12 and supposedly illustrated in Figure 10, still does not match. And the conclusion: that 43.2% of all occupied housing units in the SCAG region are cost-burdened, does not seem to be illustrated in Figure 10. Depending on the corrections needed, update the last sentence: "However, in Orange County, the ratio of severely cost-burden households of [insert] all [end insert] [strikeout] overall paying [end strikeout] renters increased by 2.4 percent."</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Figures 9 and 10 are updated to differentiate between renter- and owner-occupied units.</p>
0001785.34	<p>#40 Clarification p. 14; Figure 11 Please specify whether the racial/ethnic categories are all for non-Hispanic groups other than Hispanic (or Latino); if so, add "non-Hispanic" to categories other than Hispanic/Latino.</p>	<p>Comment noted. Category labels come from Census data.</p> <p>References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context.</p>
0001785.35	<p>#41 Clarification p. 14; paragraph 1; sentence 2</p> <p>"All other racial and ethnic households experienced greater cost burden regardless of whether they rent or own their homes than when compared to [insert] non-Hispanic [end insert] White households. Hispanic (-[insert]or[end insert] Latino) and [insert] non-Hispanic [end insert] Black homeowners and renters experience the greatest cost burden across racial and ethnic households in the SCAG region."</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context</p>

ID	COMMENT	RESPONSE
0001785.36	<p>#42 Clarification p. 16; paragraph 1; sentence 2</p> <p>“When considering income, there are emerging inequities for households with very low income.” This sentence is unclear and does not explain emerging inequities. “Severe [insert] cost burden [end insert] [strikeout] overpayment [end strikeout] is a particular burden for low-income families, who have extremely limited resources to spend on daily needs such as transportation, food, and healthcare in addition to housing costs.” Use consistent language throughout document.</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The sixth paragraph of Section 4.4 Cost Burdened Households is changed to read, “For very low income households, the inequity of cost burden is particularly significant in comparison to other households. Severe cost burden is a particular burden for low-income families, who have extremely limited resources to spend on daily needs such as transportation, food, and healthcare in addition to housing costs.”</p>
0001785.37	<p>#43 Clarification p. 16; paragraph 2 & 3</p> <p>Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of “non-Hispanic” if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly.</p> <p>For example: “A disparity in cost burden emerges in a further analysis between communities of color and [insert] non-Hispanic [end insert] White communities. Across the region, [insert] non-Hispanic [end insert] Black, Hispanic ([insert]or[end insert] Latino), and [insert] non-Hispanic [end insert] Native American households – regardless of whether they own or rent – experience the greatest housing cost burdens. While a little over one of four [insert] non-Hispanic [end insert] White households pay more than 30 percent of their income on rent, almost one out of two Hispanic (or Latino) households do (46 percent). This figure is 41 percent for [insert] non-Hispanic [end insert] Black households and 33 percent for [insert] non-Hispanic [end insert] Native American households. The high burden of housing costs carries over into homeownership. For Hispanic ([insert]or[end insert] Latino) home-owning households, 18 percent are cost burden and is 14 percent and 17 percent for [insert] non-Hispanic [end insert] Black and [insert] non-Hispanic [end insert] Native American households, respectively. This is significantly higher than the rate for [insert] non-Hispanic [end insert] White home-owning households at 10 percent.</p> <p>Considering that communities of color have almost twice the rate of poverty (households below 200 percent the poverty line) than the non-Hispanic White community (41 percent and 22 percent, respectively), cost burden inequities further widen for these communities since fewer resources are available to spend on necessities such as food, transportation, and healthcare.”</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context</p>
0001785.38	<p>#44 Clarification p. 16 4.4 Cost Burdened Households By Race & Ethnicity</p> <p>a) The page 16 discussion on cost-burdened households by race and ethnicity and the SCAG region overall, cites percentages that seem to lack a data source. Is this also SCAG’s 2022 Racial Equity Report (the Source Reference #7 at the end of the last sentence in the third paragraph of this section)?</p> <p>b) It would also be helpful to the reader if the cost burdened information by race and ethnicity could also be presented in a Figure, to allow for a more streamlined comparison of the data.</p>	<p>Updating ethnicity/race data and included a figure for clarity and consistency with Racial Equity Technical Report.</p>

ID	COMMENT	RESPONSE
0001785.39	<p>#45 Clarification p. 16 & 18; +Figure 14 4.5 Overcrowding</p> <p>a) The Overcrowding discussion, starting on page 16, states that the U.S Department of Housing and Urban Development defines overcrowding as more than 1.01 persons per room in a housing unit. Please include a footnote or clarification that there are certain rooms in a housing unit that are excluded from the 1.01 persons per room calculation, and identify said rooms that are excluded.</p> <p>b) Please reference in the narrative discussion, the associated Figures that illustrate the overcrowding data (e.g., Figure 12, Figure 13, Figure 14 and Figure 15, where applicable in the narrative discussion).</p> <p>c) The narrative also states that "Since 2012, these [overcrowding] percentages have slightly decreased." Please clarify if "these" refers to Los Angeles County or the SCAG region. Unclear.</p> <p>d) Figure 14 is: missing/mislabeled the bar to illustrate the percentage of White households experiencing overcrowding. The title of Figure 14 should also reference that it is households that is being depicted.</p> <p>e) Figure title suggests data is broken out by race and ethnicity; please clarify if all groups listed mutually exclusive or if it is 'select racial/ethnic' categories being reported if only Whites are broken out as being Hispanic or not. Figure should be labeled accordingly.</p> <p>f) The narrative on the second paragraph of page 18 states that Black and Asian/Pacific Islander households have overcrowding rates of 3 and 4 percent, respectively. If the report is rounding up the percentages illustrated in Figure 14, the percentage for Asian/Pacific Islanders should be revised from 4 to 5 percent, similar to what was done for the Black households data.</p>	<p>The first paragraph of Section 4.5 Overcrowding is changed to read, "The U.S. Department of Housing and Urban Development (HUD) defines overcrowding as more than 1.01 persons per room in a housing unit, excluding bathrooms and kitchens."</p> <p>The third paragraph of Section 4.5 Overcrowding is changed to read, "Since 2012, the percentage of all overcrowded units in the SCAG region have slightly decreased (Figure 12). The latest data shows that in 2021, 9.7 percent of all occupied units in the SCAG region were overcrowded. Of that, Los Angeles County had the highest rate with 11.2 percent of units that were overcrowded (Figure 13)."</p> <p>The fourth paragraph of Section 4.5 Overcrowding is changed to read, "However, a more dire picture is illustrated when comparing this statistic to severe overcrowding, defined as more than 1.50 persons per room (Figure 14)."</p> <p>The fifth paragraph of Section 4.5 Overcrowding is changed to read, "Similar to other data on existing conditions shared in this chapter, communities of color represent a disproportionate amount of the SCAG region's overcrowding data (Figure 15)."</p> <p>The title of Figure 14 is changed to read, "Figure 15. Severe Overcrowding Households by Race and Ethnicity" and labels are updated to include White households.</p> <p>The title of Figure 15 is changed to read, "SCAG Region Severe Overcrowding Households Percentage Change 2012 - 2021".</p> <p>The fourth paragraph of Section 4.5 Overcrowding is changed to reflect Equity Analysis Technical Report rather than SCAG's 2022 Baseline Conditions Report.</p> <p>References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context.</p>
0001785.40	<p>#46 Clarification p. 18; paragraph 2</p> <p>Any uses of racial/ethnic group data should be accurately described and reflect names of categories in data used, not truncated as the lack of ethnicity descriptor is a different category. Therefore, all instances where there are mentions of racial/ethnic categories should include the descriptor of "non-Hispanic" if that is the full category descriptor. This should occur throughout the narrative even if it seems redundant, e.g., non-Hispanic Black, non-Hispanic White. Please verify original source data categories and update narrative accordingly.</p> <p>"Similar to other data on existing conditions shared in this chapter, communities of color represent a disproportionate amount of the SCAG region's [insert] overcrowded population [end insert] [strikeout] overcrowding data [end strikeout]. Across the region, there is a much higher likelihood for Hispanic ([insert]or[end insert] Latino) households to be living in overcrowded housing with approximately one out of 10 [insert] households [end insert] in overcrowded conditions at 10 percent, while [insert] non-Hispanic [end insert] White households have a rate of about one out of 100 (1 percent). While lower than Hispanic ([insert]or[end insert] Latino) households, [insert] non-Hispanic [end insert] Black and [insert] non-Hispanic [end insert] Asian/Pacific Islander households also have higher overcrowding rates at 3 percent and 4 percent, respectively.⁸"</p>	<p>Comment noted. Category labels come from Census data. The fifth paragraph in Section 4.5 Overcrowding is changed to read, "Similar to other data on existing conditions shared in this chapter, communities of color represent a disproportionate amount of the SCAG region's overcrowded population. Across the region, there is much higher likelihood for Hispanic and/or Latino households to be living in overcrowded housing with approximately one out of 10 households in overcrowded conditions at 10 percent, while White households have a rate of about one out of 100. While lower than Hispanic and/or Latino households, Black and Asian/Pacific Islander households also have higher overcrowding rates at 3 percent and 4 percent, respectively.</p> <p>References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context.</p>

[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]

ID	COMMENT	RESPONSE
0001785.41	<p>#47 Clarificationp. 19; paragraph 1; last sentence "Housing prices and rents increase further out of reach for existing residents." • Sentence seems incomplete.</p>	<p>The first paragraph in Section 4.6 Displacement Pressures is changed to read, "As a response to market demand for more housing for all income levels, higher income households might look toward these at-risk communities to meet their own housing needs. Consequently, this could result in an increase of housing prices and rent that is further out of reach for existing residents in these at-risk communities."</p>
0001785.42	<p>#48 Clarification, p. 19; paragraph 2 "This neighborhood change of [insert] a lower-income neighborhood [end insert] [strikeout] an initially lower socioeconomic status [end strikeout] transitioning to one of higher income and socioeconomic status, also known as gentrification, is considered as a precursor to rising housing costs and displacement....The same study noted there was no significant relationship between rent increases and losses of low-income White households.9" • Does the last sentence refer to Whites that may also be Hispanic or Latino or non-Hispanic Whites? [See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The second paragraph of Section 4.6 Displacement Pressures is changed to read, "This neighborhood change of a lower-income neighborhood transitioning to one of higher income and socioeconomic status, also known as gentrification, is considered as a precursor to rising housing costs and displacement... The same study noted there was no significant relationship between rent increases and losses of low-income non-Hispanic White households." References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context.</p>
0001785.43	<p>#49 Clarification p. 20-21; Figure 16 Figure 17 4.7 Homelessness a) Label Figures 16 and 17 or revise the titles of these figures, to clarify that the numbers on the vertical axis represent the homelessness population. b) On Figure 14, there are references to the plotted data such as "Santa Ana, Anaheim/Orange County," "San Bernardino City & County," "Riverside City and County," and "Oxnard, San Buenaventura/Ventura County." Please include a footnote explaining if the "County" references refer to the homeless population in county unincorporated territory in addition to the cities cited, to avoid a misinterpretation that it refers to the number of homeless in the entire county boundary. Also, the graph approach is very difficult to read and perhaps a table of the data would be a better approach to identify the change in the homeless population across the years. c) are the geographic areas reported for Health Care Agencies or some other type of agency? Please add the agency type to the title of Figure 16.</p>	<p>The titles of Figures 16 and 17 are changed to include People Experience Homelessness. The United States Department of Housing and Urban Development (HUD) requires that Continuums of Care (CoCs) conduct an annual count of sheltered and unsheltered people experiencing homelessness on a single night in January through partnerships with local jurisdictions, community members, and non-profit organizations. HUD defines a CoC as a community plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximize self-sufficiency. All CoCs within the SCAG region include the entire county, incorporated cities and unincorporated county areas, they are a part of except for Los Angeles City and County CoC which is separate from Glendale CoC, Pasadena CoC, and Long Beach CoC. Please reference the following map: https://homelessstrategy.com/map-of-california-continuums-of-care-by-region/. A table is added to accompany Figures 16 and 17.</p>
0001785.44	<p>#50 Clarification, p. 21; paragraph 1 "According to California Continuums of Care (COC), the unhoused population count for CoCs across the SCAG region were 53,729 in 2012 and [insert] increased [end insert] [strikeout] jumped [end strikeout] by 38 percent to over 74,000 in 2019. However, in 2021 the count dropped [strikeout] significantly [end strikeout] to less than 23,000 and [insert] then increased [end insert] [strikeout] jumped [end strikeout] to almost 85,000 in 2022[insert];[end insert] [strikeout], meaning that [end strikeout] the unhoused population [insert] increased overall [end insert] [strikeout] jumped [end strikeout] by 58 percent in the last decade [insert] but is still lower than the 2006 count of XXXXX [end insert]. The reason for the 2021 fluctuation may be caused by undercounting due to the pandemic [insert] and associated shutdowns [end insert]." Please add count for 2006 into narrative. [See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The third paragraph of Section 4.7 Homelessness is changed to read, "According to California Continuums of Care (COC), the unhoused population count for CoCs across the SCAG region were 53,729 in 2012 and increased by 38 percent to over 74,000 in 2019. However, in 2021 the count dropped to less than 24,000 and then increased to almost 85,000 in 2022; the unhoused population increased overall by 58 percent in the last decade but is still lower than the 2006 count of 101,856. The reason for the 2021 fluctuation may be caused by undercounting due to the pandemic and associated shutdowns."</p>
0001785.45	<p>#51 Clarification, p. 22; paragraph 2; last sentence "In contrast, only 14,000 units were permitted at its lowest point in 2009, during the [insert] lowest point [end insert] [strikeout] peak [end strikeout] of the most recent housing recession." [See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The first paragraph in the 5.1 Permits Issued section has been changed to read, "In contrast, only 14,000 units were permitted in 2009, which was the lowest point peak of the most recent housing recession."</p>

ID	COMMENT	RESPONSE
0001785.46	<p>#52 Clarification p. 22, 23-24 Figure 18 Figure 19 5 Housing Production: Building Permits Issued versus Housing Units Permitted</p> <p>This entire discussion about how many building permits were issued in the SCAG region, for single- and multi-family units, needs to carefully be re-reviewed and revised, both in the narrative discussion and in Figures 18 and 19. Does the data represent the number of building permits issued, or the number of units that were permitted? Clarity on this issue is especially critical for multi-family development, where one building permit can be issued for one building that incorporates tens or hundreds of residential units within that one building. This clarity would also affect the conclusions about trends. What should be depicted is the number of units that were permitted, not the number of building permits issued. The latter has no real relevance to housing supply diversity, since it does not represent the total number of housing units that were constructed.</p> <p>a) For example, if the data represent the number of units permitted, then change the title of Figure 18 to: "SCAG Region [insert] Number of Housing Units Permitted [end insert] [strikeout] Building Permits Issued [end strikeout]" and "The share of total [insert] units permitted [end insert] [strikeout] permits [end strikeout] by housing type also fluctuated over the past four decades."</p> <p>b) Figure 19. SCAG Region [insert] Shares of Housing Units Permitted by Type [end insert] [strikeout] Building Permits Issued Percentage [end strikeout]</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The title of Figure 18 is changed to read, "Number of Housing Units Permitted" and the title of Figure 19 is changed to read, "SCAG Region Shares of Housing Units Permitted by Type".</p>
0001785.47	<p>#53 Clarification p. 23; paragraph 2; last sentence</p> <p>"While one could conclude that the SCAG region collectively met a substantial portion of its total housing need, a significant percentage of affordable housing need was largely unmet as illustrated in Figure 19." • Explain how the affordable housing need was unmet and how Figure 19 illustrates that.</p>	<p>Comment noted. Unmet need refers to permits not issued to meet RHNA allocations by income category.</p> <p>The fourth paragraph in Section 5.1 Permits Issued is changed to read, "While one could conclude that the SCAG region collectively met a substantial portion of its total housing need, a significant percentage of affordable housing need was largely unmet as illustrated in Figure 20."</p>
0001785.48	<p>#54 Clarification p. 24 Figure 20 5 Housing Production: 5th Cycle RHNA</p> <p>The discussion on the 5th cycle RHNA should:</p> <p>a) first reference that this discussion is HCD information on the 5th RHNA cycle, and should also include information on the dates of the planning period of the 5th RHNA cycle, in addition to the 6th RHNA cycle, to give the reader some context.</p> <p>b) What does "fulfillment" mean? Is it the number of building permits issued, or residential units finished? Change title to "Figure 20. SCAG Region 5th Cycle RHNA [insert] Share of Income Category Fulfillment [end insert] [strikeout] Percentage[strikeout] ([insert]Units Permitted[end insert])"</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The fifth paragraph in Section 5.1 Permits Issued is changed to read, "If this trend continues into the 6th cycle (2021-2029), the existing need of lower income households will perpetually increase into the 7th RHNA cycle and beyond.</p> <p>The title of Figure 20 is changed to read, "SCAG Region 5th Cycle RHNA Share of Income Category Fulfillment (Units Permitted)"</p>

ID	COMMENT	RESPONSE
0001785.49	<p>#55 Clarification, p. 24; paragraph 2</p> <p>"The trend of producing only a small portion of affordable housing combined with factors such as homelessness, and for communities of color lower homeownership rates and increased cost-burden, overcrowding, and substandard housing, suggest a problem that extends beyond supply and demand." First sentence is difficult to understand. Reword or use additional punctuation to clarify.</p>	<p>The sixth paragraph of Section 5.1 Permits Issued is changed to read, "The trend of producing only a small portion of affordable housing, homelessness, and disproportionate impacts to communities of color (such as lower homeownership rates, overcrowding, increased cost-burden, and substandard housing) suggest a problem that extends beyond supply and demand."</p>
0001785.50	<p>#56 Clarification p. 25 Figure 21 Paragraph 2 5.2 Challenges in Meeting Housing Needs</p> <p>The narrative in this section discusses the ratio of housing units produced per persons added to the region, over five distinct decades. When discussing how the ratio of units to population increased or decreased, is the correct relationship being understood? Would the use of the term "improved" or "worsened" be clearer? Change title to "Figure 21. SCAG Region [insert] Housing Unit [end insert] vs. Population [insert] Growth [end insert] Comparison"</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The second paragraph in the Need is Higher subsection of Section 5.2.1 Planning is changed to read, "By the 1990s, the ratio worsened to 1 new unit for every 4.8 persons added. While the ratio has steadily improved over the past two decades, this indicator suggests the region was not building enough units over previous decades."</p> <p>The title of Figure 21 is changed to read, "SCAG Region Housing Units vs. Population Growth Comparison".</p>
0001785.51	<p>#57 Clarification, p. 26; paragraph 5</p> <p>"In addition to the new requirements of realistic development capacity, achieving compliance has also become stricter. Jurisdictions in the SCAG region that achieved compliance by October 2022 have until February 2025 to complete any necessary rezonings. Jurisdictions that did not achieve compliance by October 2022 must now complete necessary rezonings before they can receive HCD approval. This poses a problem for jurisdictions that need funding to implement their housing element but cannot achieve the grant requirement of housing element compliance due to the inability to undertake the rezonings."</p> <ul style="list-style-type: none"> • Language regarding deadlines for rezoning is not consistent across RTP documents. Review and ensure correct dates are reported across all documents. • Is the February 2025 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned and inconsistent with other documents and sections that mention an October 2024 deadline. Please check dates against statute and update as applicable throughout all documents regarding this topic. 	<p>Comment noted. Jurisdictions in the SCAG region that achieved compliance by October 2022 have until February 2025 (3 years and 120 days) to complete any necessary rezonings and jurisdictions that did not achieve compliance by October 2022 must now complete necessary rezonings before they can receive HCD approval. References to this other technical reports have been updated to reflect the correct due date and ensure consistency.</p>
0001785.52	<p>#58 Clarification, p. 26; paragraph 6</p> <p>"In the early 21st century, expansion on the urban fringe continued in some places, though the region's fragile and rugged natural landscape—as well as sheer distances—present substantial limits."</p> <ul style="list-style-type: none"> • Remove "fragile" or expand on what this means 	<p>The first paragraph in the Location subsection of Section 5.2.1 Planning is changed to read, "In the early 21st century, expansion on the urban fringe continued in some places, though the region's rugged natural landscape—as well as sheer distances—present substantial limits."</p>
0001785.53	<p>#59 Clarification, p. 27; paragraph 4</p> <p>"Beyond planning challenges, the cost of building residential units is another primary barrier to meet housing need. Not only does it include construction costs, such as the cost of land, materials, and labor, but jurisdictional processes, [insert] state mandates [end insert], and environmental requirements can also add cost to the process."</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001785.54	<p>#60 Clarification, p. 27; paragraph 7; sentence 2 "Issues such as a smaller workforce pool after the last recession [insert] in 20xx [end insert], an aging workforce where one in five workers is currently over 55, and strong competition from related..." • Specify which recession is being referred to.</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The first paragraph in the Cost of Labor / Labor Shortage subsection in Section 5.2.2. Building is changed to read, "Issues such as a smaller workforce pool after the last recession in 2007, an aging workforce where one in five workers is currently over 55, and strong competition from related industries have affected the industry and are expected to persist for the near term."</p>
0001785.55	<p>#61 Clarification, p. 28; Table 2 "Table 2. California Cost Construction [insert] Costs [end insert] Annual Percentage Change" • Are these all types of construction or just housing? Perhaps include clarification in title.</p>	<p>The title of Table 2 is changed to read, "California Construction Cost Index Annual Percentage Change".</p>
0001785.56	<p>#62 Clarification, p. 29 Section 5.2 The Insufficient Resources discussion states that a lack of local jurisdiction staffing or funding to implement affordable programs or design zoning codes can be a restriction to encouraging housing production. Please cite the survey or source of this conclusion.</p>	<p>The paragraph in the Insufficient Resources subsection in Section 5.2.2. Building is changed to read, "... municipalities do not always have sufficient resources (staffing or funding) to implement programs and zoning code needed to support housing production."</p>
0001785.57	<p>#63 Clarification p. 30 5.2 Challenges in Meeting Housing Needs: Development and Impact Fees</p> <p>In the discussion on development impact fees on page 30, reference is made to needing these fees "to support the approval of the development such as staff time for permitting, inspections." There may be confusion between a local jurisdiction imposing a processing fee, where the fee is used to cover the cost of staff time to review and process the development application and associated environmental analyses, versus a development impact fee, which is used to assess a pro rata share of fees to cover local, county or regional need for schools, parks, or infrastructure that are needed to support the increased population generated by the proposed project.</p>	<p>Comment noted. Development impact fees include various departmental specific plan check and inspection fees as well as fees to mitigate maintenance costs to community services.</p>
0001785.58	<p>#64 Clarification, p. 31; paragraph 2 "As illustrated in previous sections, [insert] multiple factors that are found throughout the planning and building process contribute to [end insert] [strikeout] the causes of [end strikeout] the housing crisis [strikeout] are at various points in the process to plan and build housing [end strikeout]. ... The following section describes a snapshot of funding for planning and building housing, technical assistance offered by SCAG, and strategies implementable by local jurisdictions [insert]—all of which may contribute to increasing the [end insert] [strikeout] – all various ways to increase [end strikeout] housing supply." [See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The first paragraph in Section 6. Regional Best Practices is changed to read, "As illustrated in previous sections, multiple factors that are found throughout the planning and building process contribute to the housing crisis. [...] The following section describes a snapshot of funding for planning and building housing, technical assistance offered by SCAG, and strategies implementable by local jurisdictions - all of which may contribute to increasing the housing supply."</p>

ID	COMMENT	RESPONSE
0001785.59	<p>#65 Clarification, p. 32; paragraph 2</p> <p>"SB 2 also established the Permanent [insert] Local [end insert] Housing Allocation ([insert]PLHA [end insert] [strikeout]PHLA[end strikeout]) [insert] program [end insert]. Under this grant, the amount of PLHA funding for entitlement jurisdictions is based on the formula funding for the Community Development Block Grant (CDBG) Program for a five-year period, and through a competitive grant program to non-entitlement jurisdictions. As of Round 3, all awarded applicants in the SCAG region were entitlement jurisdictions...."</p> <ul style="list-style-type: none"> Briefly explain what 'non-entitlement' and 'entitlement' jurisdictions are and if this means that some agencies qualify under certain parameters or not. Perhaps refer reader to location to find more detailed information. <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Language updated. "SB 2 also established the Permanent Local Housing Allocation (PLHA) program. Under this grant, the amount of PLHA funding for entitlement jurisdictions is based on the formula funding for the Community Development Block Grant (CDBG) Program for a five-year period, and through a competitive grant program to non-entitlement jurisdictions. As of Round 3, all awarded applicants in the SCAG region were entitlement jurisdictions....Under PLHA and other grants, entitled jurisdictions are those that are eligible applicants for the entitlement formula component per HSC 50470(b)(2)(B)(i)(l).</p> <p>HSC 50470(b)(2)(B)(i)(l) states (b) Moneys in the Building Homes and Jobs Trust Fund shall be appropriated either through the annual Budget Act, or as provided in this subdivision, in accordance with the following:</p> <p>(2) Moneys collected on and after January 1, 2019, shall be allocated as follows:</p> <p>(B)(i) Seventy percent of moneys deposited in the fund shall, upon appropriation by the Legislature, be made available to local governments as follows:</p> <p>(l) Ninety percent of the moneys specified in this subparagraph shall be allocated based on the formula specified in Section 5306 of Title 42 of the United States Code, in accordance with the distribution of funds pursuant to that formula for the federal Fiscal Year 2017, except that the portion allocated to nonentitlement areas pursuant to that section shall be distributed through a competitive grant program, administered by the department, as follows:</p> <p>(ia) The department shall award priority points to a county that has a population of 200,000 or less within the unincorporated areas of the county, to a local government that did not receive an award based on the formula specified in Section 5306 of Title 42 of the United States Code in 2016, and to a local government that pledges to use the money awarded pursuant to a competitive grant under this subclause to assist persons experiencing or at risk of homelessness, including, but not limited to, providing rapid rehousing, rental assistance, navigation centers, and the new construction, rehabilitation, and preservation of permanent and transitional rental housing.</p> <p>(ib) Moneys awarded to a local government pursuant to the competitive grant program shall be used for the purposes specified in subparagraph (D)."</p>
0001785.60	<p>#66 Clarification, p. 37; paragraph 1</p> <p>"There are a variety of strategies and tools that local jurisdictions and stakeholders can employ to plan for and [insert] facilitate the building of [end insert] [strikeout] build [end strikeout] housing."</p> <p>[See Table 9. HOUSING TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The first paragraph in Section 7. Best Practices for Jurisdictions and Stakeholders is changed to read, "There are a variety of strategies and tools that local jurisdictions and stakeholders can employ to plan for and facilitate the building of housing."</p>
0001785.61	<p>#67 Clarification, p. 37; paragraph 5</p> <p>"15-minute communities draw social and economic resilience benefits that address shocks and stressors including households with limited mobility options, the age dependency ratio, and limited tree canopy/urban heat island effect."</p> <p>Do 15-minute communities draw or create benefits?</p>	<p>15-minute communities naturally create benefits as the overarching theme is to promote a community in which one can access their most basic day-to-day needs, services, and amenities within a 15-minute walk, roll or bike from their home. This can especially be a critical resilience benefit as it can support improved connectivity and accessibility for the most vulnerable members of a community that may have limited mobility options to have greater accessibility to important resources and destinations through improved proximity of land uses and infrastructure improvements that promote healthier and more sustainable environments (urban greening for example). This strategy can apply broadly to many types of communities across the SCAG region and many neighborhoods throughout the region already have many of the needed characteristics. The 15-minute community concept supports easier access to local parks and businesses, promotes economic diversity, and creates stronger community ties.</p>

ID	COMMENT	RESPONSE
0001785.62	<p>#68 Clarification, p. 38; Figure 23</p> <p>Figure title suggests data is broken out by race and ethnicity; please clarify if all groups listed mutually exclusive or if it is 'select racial/ethnic' categories being reported if only Whites are broken out as being Hispanic or not. Figure should be labeled accordingly with "non-Hispanic" for each category other than Hispanic or Latino if the data actually reflect race categories broken out by Hispanic/Latino ethnicity. A note should be added to the Figure if only the White category is non-Hispanic and all others may include Hispanics or Latinos.</p>	<p>Figure 23 in Section 7.1 Targeting Priority Development Areas (PDA) is changed to remove "People of Color" as a category to remain consistent with other figures in the report.</p> <p>References to individual races (Native American, Asian, Black, Native Hawaiian/Pacific Islander, White, and Multiracial/Other) are not of Hispanic/Latino ethnicity, unless stated otherwise. Section 4.3.1, paragraph 2 of the Equity Analysis Technical Report provides additional context.</p>
0001785.63	<p>#69 Clarification</p> <p>p. 39;</p> <p>Age dependency ratio</p> <p>The narrative discusses the age dependency ratio as being "measured by the percentage of the population younger than 20 years old and older than 64." The typical age dependency ratio is the population under 15 and 65+. Please verify SCAG's definition and if ratio used deviates from traditional ratio, explain why the ratio was changed.</p>	<p>The age dependency ratio definition, data, and associated figure (24) are changed to be consistent with the the traditional age dependency ratio, which uses a population age range of 14 years old and younger to 65 years and older.</p>
0001785.64	<p>#70 Clarification</p> <p>p. 39, 40</p> <p>Figure 25</p> <p>7 Best Practices for Jurisdictions and Stakeholders: Tree Canopy</p> <p>Please clarify how an area that is or is not covered by tree canopy, is determined. Is this done on a parcel by parcel basis, or the number of trees located by area or acreage, or other factor? Please provide a summary of the State Department of Public Health's methodology, given that the SCAG region is identified as having more than 90% of its acre not covered by tree canopy. Also, perhaps there should be some discussion about the breadth of geography that the SCAG region encompasses, which includes high desert communities.</p>	<p>Additional detail on defining "tree canopy" has been added to Section 6.2.1 in the Land Use and Communities Technical Report.</p>
0001785.65	<p>#71 Clarification, p. 39; paragraph 2</p> <p>"These communities are more susceptible to the effects of extreme heat events and offer less carbon sequestration, making the community overall a less pleasant place to engage in activities."</p> <ul style="list-style-type: none"> • Please clarify if 'activities' include everything or if it is referring to physical and/or outdoor activities. 	<p>Comment noted. Confirming that "activities" refers to all activities, not just recreational.</p>
0001785.66	<p>#72 Clarification, p. 40; Figure 25</p> <p>Include year of data being reported in title and source.</p>	<p>Comment noted. The source for Figure 25 is changed to read, "California Department of Public Health and Multi-Resolution Land Characteristics Consortium, National Land Cover Database (NLCD) 2011" and the year is included in the title as well.</p>
0001785.67	<p>#73 Clarification, p. 41; paragraph 1</p> <p>"Once inefficiencies are identified, jurisdictions can implement strategies such as consolidating the review process, creating multiple points of entry to secure a building permit, creating an expedited process for certain types of projects such as affordable housing, updating permitting software, and lowering the threshold for project to receive a ministerial permit.32"</p> <ul style="list-style-type: none"> • What are "multiple points of entry to secure a building permit"? 	<p>The third paragraph of Section 7.2 Streamlining the Approval Process is changed to read, "Once inefficiencies are identified, jurisdictions can implement strategies such as consolidating the review process, allow for both an online application process and over-the-counter service for building permits, creating an expedited process for certain types of projects such as affordable housing, updating permitting software, and lowering the threshold for projects to receive a ministerial permit."</p>
0001785.68	<p>#74</p> <p>7.4 Housing Supportive Infrastructure</p> <p>p. 42</p> <p>The second paragraph on page 42 states "Moreover, many jurisdictions do not have an updated to date assessment of their utility infrastructure.....". Perhaps this should read "updated assessment" or "up-to-date assessment"?</p>	<p>The second paragraph on Section 7.4 Housing Supportive Infrastructure is changed to read, "Moreover, many jurisdictions do not have an up to date assessment of their utility infrastructure location, capacity, and maintenance needs."</p>

ID	COMMENT	RESPONSE
0001785.69	#75 Clarification, p. 44 Ensure language of regional planning policies is the same as in the main Connect SoCal document.	Comment noted. Consistency regarding regional planning policies between the Main Book and the Housing Technical Report is confirmed. The first policy in Section 8.1 Regional Planning Policies is changed to read, "Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and similar) to further fair housing access and equity across the region".
Submitted by	Orange County Council of Governments	Submittal 0001786
0001786.01.1	Table 10: Land Use Community Technical Report Comments #1 General Comment, All maps All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific technical report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.	Comment noted. Maps are updated, where feasible.
0001786.01.2	#2 General Comment, All maps with growth forecast and development types data Add language to map and/or map page "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."	A map disclaimer is added.
0001786.01.3	#3 General Comment, All pages Add "2024" to all technical report page headers' titles	Technical report page headers' titles have been updated to include "2024".
0001786.01.4	#4 General Comment, All pages In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data	Sources have been updated to reference the original data source, where applicable.
0001786.01.5	#5 General Comment, All pages Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.	Comment noted. The text has been updated to capitalize "Plan" where applicable.
0001786.01.6	#6 General Comment, All pages For data that is not derived from Connect SoCal models, cite source.	Sources have been updated to reference the original data source, where applicable.
0001786.01.7	#7 General Comment, All pages If definitions come from specific source or statute, include the reference in the narrative.	Comment noted. References to specific sources or statutes for a given definition have been updated, where feasible.
0001786.02	#8 General Comment, All pages Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.	Comment noted. Data on existing and planned infrastructure capacity, such as water and sewer capacity, are not available at the local and neighborhood levels.
0001786.03	#9 General Comment, All pages Note that when focusing growth in infill settings, existing/planned service areas, and within the planning boundary outside of an agency's legal boundary, otherwise known as "Spheres of Influence" the growth must be feasible	Comment noted.

ID	COMMENT	RESPONSE
0001786.04	<p>#10 General Comment, All pages Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.</p>	Where applicable, SCAG has added text to tables and graphics to reflect where numbers may not sum due to rounding.
0001786.05	<p>#11 Clarification, All pages Pertaining to any discussion on farm land lost or at risk, it should be noted that not all land used for farming is/was permanent farmland and was not necessarily designated in the zoning code or general plan for farming. Many of these areas are zoned for a different use and land owners farm the land for income until the development applications are approved and construction permits are issued. Additionally, farming was one of the few permitted uses allowed in areas designated flight hazard zones. For example, a great deal of the City of Irvine privately-owned land surrounding the former Marine Air Station El Toro was utilized for farming because no other uses were permitted. Once El Toro was closed, the land was rezoned to permit residential, but continued to be used as farmland for many years.</p> <p>Add notes to language and table or figures that indicate "not all land used for farming was permanent farmland and was not necessarily designated in the zoning code or general plan for farming."</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>	Comment noted. Farmlands information was obtained from the Farmland Mapping & Monitoring Program (FMMP) in the Division of Land Resource Protection in the California Department of Conservation. Data from this program shows farmland by use, not zoning status.
0001786.06	<p>#12 Correction, All pages References and source citations to the American Community Survey dataset should use the word "estimates" not "sample", e.g., "Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates" or for PUMS: "Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021"</p>	This correction is applied.
0001786.07	<p>#13 General Comment, All pages The phrase "natural and farmlands" is used throughout this and other documents. To clarify, amend phrasing, e.g., 'natural lands and farm lands' or 'natural and farm lands'. Example on page 2 paragraph 2 second sentence: "This chapter also covers climate resilience, and natural and farmland preservation, and complete communities"... where the current wording language does not make sense to say "...and natural preservation" Please revise phrasing and proliferate throughout all documents.</p>	Comment noted. Phrasing is amended to reflect this comment.
0001786.08	<p>#14 Clarification, p. 1; bullet 1 "Regional Housing Needs Assessment (RHNA), the [insert] state-mandated [end insert] [strikeout] state mandated [end strikeout] vehicle for identifying [insert] and allocating [end insert] housing need in the state." [See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.

ID	COMMENT	RESPONSE
0001786.09	<p>#15 Clarification, p. 1; bullet 5 on page "SCAG's Racial Equity Early Action Plan, defined racial equity for SCAG and established a series of goals and strategies for SCAG to advance racial equity in the region. The Racial Equity Early Action Plan has spurred additional racial equity centered work including the convening of the Racial Equity and Regional Planning Subcommittee[insert], which [end insert] developed a series of recommendations to advance racial equity in the Plan. These recommendations are reflected throughout the Plan."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The third bullet under the third paragraph of the Executive Summary for the Land Use and Communities Technical Report, "The Racial Equity Early Action Plan has spurred additional racial equity centered work including the convening of the Racial Equity and Regional Planning Subcommittee developed a series of recommendations to advance racial equity in the Plan," is changed to read "The Racial Equity Early Action Plan has spurred additional racial equity centered work including the convening of the Racial Equity and Regional Planning Subcommittee, which developed a series of recommendations to advance racial equity in the Plan."</p>
0001786.10	<p>#16 Clarification, p. 2; paragraph 1; sentence 4 "The Local Data Exchange process informed the FRDP through a series of touchpoints with local jurisdictions where they were presented with information on project growth in their jurisdictions for input to ensure [insert] entitlements were accurately reflected and the PDAs and GRRAs were considered [end insert] [strikeout] these assumptions were reflected in local plans[end strikeout]."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted.</p>
0001786.11	<p>#17 Clarification p. 4; paragraph 2; sentence 1 "Under SB 375, SCAG's role is to coordinate the development of the Connect SoCal 2024 land use pattern in partnership with local jurisdictions that are ultimately responsible for [insert] land use planning and management [end insert] [strikeout] implementing it [end strikeout]."</p> <p>last sentence "This included information on land use, transportation, priority development areas, geographical boundaries, resource areas, and growth that was shared and exchanged through a combination of one-on-one meetings [insert] with [end insert] and data submissions [insert] from [end insert] [strikeout] with local jurisdictions."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Requested revision has been made in Section 2 of the Land Use and Communities Technical Report.</p>
0001786.12	<p>#18 Clarification, p. 5; bullet 5 "Did the MPO/RTPA who has federal lands within its jurisdictional boundary involve the federal land management agencies during the preparation of the RTP? (23 CFR 450.316(d))" • Define RTPA</p>	<p>Text is changed from "Did the MPO/RTPA who has federal lands within its jurisdictional boundary involve the federal land management agencies during the preparation of the RTP?" to "Did the Metropolitan Planning Organization (MPO)/Regional Transportation Planning Agency (RTPA) who has federal lands within its jurisdictional boundary involve the federal land management agencies during the preparation of the RTP?"</p>
0001786.13	<p>#19 Revision, P.6, paragraph 2 In the second paragraph, revise the first sentence to include the following language: Under SB 375, SCAG's role is to coordinate the development of the Connect SoCal 2024 land use pattern in partnership with local jurisdictions that are ultimately responsible for implementing it, where applicable and feasible.</p>	<p>Comment noted. We did not incorporate "where applicable and feasible." Instead, we added the following sentence to the section. Pursuant to California Government Code § 65080 section (K) Neither a sustainable communities strategy nor an alternative planning strategy regulates the use of land, nor, except as provided by subparagraph (J), shall either one be subject to any state approval. A sustainable communities strategy does not supersede the exercise of the land use authority of cities and counties within the region</p>

ID	COMMENT	RESPONSE
0001786.14	<p>#20 Clarification, p. 6; paragraph 4; sentence 1 "Put simply, the emphasis of RHNA in the [insert] 6th [end insert] [strikeout] sixth [end strikeout] cycle expanded to a more comprehensive assessment of the need for housing: [insert] explicitly addressing [end insert] the existing need plus the need to house anticipated population growth. In prior cycles it focused on need due to anticipated population growth [insert], which addressed existing need through adjusting future households. [end insert]"</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.
0001786.15	<p>#21 Clarification, p. 6; paragraph 5; sentence 2 "Some local updates are not due to HCD until October 2024 and at the time of the LDX conclusion in December 2022, only 84 of 197 jurisdictions had an adopted and certified housing element." • Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic.</p>	Verified and corrected.
0001786.16	<p>#22 Clarification, p. 10; paragraph 2; sentence 1-2 "In the early twenty-first century, expansion on the urban fringe has continued in some places, though the region's fragile and rugged natural landscape—as well as sheer distances—present substantial limits. As a result, there has been an increase in infill development and a higher share of new housing consisting of multifamily units in existing communities since the Great Recession [insert], due in part to less available land to build on [end insert]." • Remove "fragile" or expand on what this means</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	"Fragile" is now defined.
0001786.17	<p>#23 Clarification, p. 10; paragraph 6; last line "From 2012 to 2019, new development throughout the region resulted in the amount of natural lands decreasing by roughly 50,000 acres, or 0.2 percent. Household and employment growth that degrades or develops vital habitats reduces the environmental services they provide us that are crucial to our regional economy, health, and overall quality of life." • Define 'natural lands' and provide source • Define 'vital habitats' and provide source</p>	<p>Comment noted. The definition for Natural Lands is included in the Plan's Glossary.</p> <p>Text is revised from "Household and employment growth that degrades or develops vital habitats reduces the environmental services they provide us that are crucial to our regional economy, health, and overall quality of life" to "Household and employment growth that degrades or eliminates habitats that provide important environmental services negatively affects our regional economy, health, quality of life and resilience."</p>
0001786.18	<p>#24 Clarification, p. 11; paragraph 2; sentence 2 "From 2012 to 2018, however, new development in areas with longstanding agricultural resulted in farmland decreasing in Southern California by more than 40,000 acres, or 3.5 percent." • Was this land all zoned as agriculture or was it zoned for another use and temporarily used as agriculture? There are portions of the region where land is zoned for residential or commercial and temporarily being used as agriculture. • Conversion of some agriculture land may also be due to rezoning to accommodate RHNA allocations.</p>	<p>Comment noted. The Plan's farmland data was obtained from the California Department's Farmland Mapping & Monitoring Program (FMMP), which classifies farmland by use and quality, not zoning designation. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. For more information, please see https://www.conservation.ca.gov/dlrp/fmmp.</p>
0001786.19	<p>#25 Clarification, p. 11; paragraph 3; sentence 2 "Additionally, development on natural and farmlands often occurs away from [insert] existing [end insert] jobs, schools, retail, health care, and high-quality transit service, leading residents to drive longer distances to access key destinations." [See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Comment noted.

ID	COMMENT	RESPONSE
0001786.20	<p>#26 Clarification, p. 12; map 1</p> <ul style="list-style-type: none"> • Map has poor resolution • Define 'Protected Open Space Areas' on the map page • Why are there several different data sources with different dates layered on top of one another? 	<p>SCAG has increased the resolution of Map 1 in the Land Use & Communities Technical Report and also included a definition of Protected Open Space included on the map. Protected Open Space and Parks are further defined in Section 5.3 in the Land Use and Communities Technical Report.</p>
0001786.21	<p>#27 Clarification, p. 15; paragraph 3; sentence 2</p> <p>"As a result, [insert] the most reasonable utilization and, where appropriate,[end insert] conservation of natural and farmlands is an important strategy to support SB 375 objectives. "</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. Natural and Agricultural Land Preservation is key environmental category for Connect SoCal 2024 Regional Planning Policies and Implementation Strategies. See Chapter 3 for more details.</p>
0001786.22	<p>#28 Clarification, p. 15; paragraph 5</p> <p>"Broadly speaking, growing sustainably requires growing [insert] partly [end insert] in places and ways that achieve substantial housing growth within complete communities while [insert] reasonably managing [end insert] [strikeout] minimizing [end strikeout] growth at the urban fringe [insert] and beyond [end insert]. [insert] To a degree, h[end insert][strikeout]H[end strikeout]ousing of various types can be located in areas [insert] that [end insert] [strikeout] which [end strikeout] promote location efficiency, good accessibility, and do not [insert] result in the utilization of [end insert] [strikeout] risk [end strikeout] natural lands or [insert] risk [end insert] environmental hazards."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. Changes applied to paragraph 5 of Section 4.1 in the Land Use and Communities Technical Report.</p>
0001786.23	<p>#29 Clarification, p. 18; table</p> <p>"Stressors: Chronic challenges that weaken natural, built, or human resources...</p> <ul style="list-style-type: none"> • Car-less Households" • Why is 'car-less household' a stressor? Aren't car-less households encouraged by State to reduce ghg? What if the lack of automobile is a purposeful choice? 	<p>Comment noted. "Car-less Households" removed from stressors, and lack of reliable and/or high quality transportation added.</p>
0001786.24	<p>#30 Clarification, p. 19; paragraph 2; last sentence</p> <p>"SB 375 requires that Connect SoCal 2024 contain a Forecasted Regional Development Pattern (FRDP) —a growth vision—that can be shown to achieve GHG emissions reductions targets when combined with transportation network data and additional Plan strategies. The Connect SoCal 2024 growth visioning process integrated sustainability considerations into a preliminary development pattern. This was then shared with local jurisdictions through the Local Data Exchange (LDX) process, which is described more comprehensively in Section 5.5, for review and feedback and became the FRDP. This is a departure from previous plans where local review occurred much earlier in the plan development process [insert], and jurisdictions could only provide public comment about the growth forecast after SCAG's visioning process and alternate growth forecasts were developed [end insert]."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted.</p>
0001786.25	<p>#31 Clarification, p. 19; paragraph 4; sentence 1</p> <p>"The Regional Growth Forecast, described in detail in the Demographics and Growth Forecast Technical Report, is [insert] the [end insert] starting point for the Connect SoCal 2024 growth vision."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Clarified.</p>

ID	COMMENT	RESPONSE
0001786.26	<p>#32 Clarification, p. 21; map 2 Add note specifying land use categories were standardized by SCAG.</p>	<p>Comment noted. Title will include (SCAG Land Use Codes). Source of the map now reads: SCAG 2023. Please note that existing land use data shown in the map represents an approximation of local conditions as of 2019. SCAG shall not be responsible for user's misuse or misrepresentation of this map. For authoritative data on these subjects, please contact the respective local jurisdiction directly. For more information on SCAG's Land Use Codes, please visit the appendix of the Land Use and Communities Technical Report."</p>
0001786.27	<p>#33 Clarification, p. 23; paragraph 1 "The latest jurisdictional existing land use, general plan land use, and other data serve as the basis for future year population and household allocation in that they reflect supply. These measures of remaining capacity are matched with county and regional [insert] growth—demand—using [end insert] [strikeout] growth – demand – using [end strikeout] a mathematical approach. As such, the projection does not reflect a build-out scenario. Combining the general plan, existing land use, and 2020 Census data above indicate that in the aggregate, local plans in the SCAG region currently have a theoretical physical capacity of roughly 8.2 million housing units—several times higher than anticipated household growth. [insert] However, for these additional units to be realized, oftentimes the existing structures would have to be demolished and replaced with higher density developments.[end insert] Using this capacity as a starting point, the Regional Growth Vision:"</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Clarified.</p>
0001786.28	<p>#34 Clarification, p. 23; bullet 3; sentence 4 "Edits received on growth are often reflective of local general plans, local growth policies,[insert] entitled and approved projects,[end insert] historic preservation, anticipated job growth, amongst several other factors."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Clarified.</p>
0001786.29	<p>#35 Clarification, p. 28; second bullet "Implement the Forecasted Regional Development Pattern of Connect SoCal 2024, consisting of household and employment projections that have been reviewed and refined by jurisdictions and stakeholders to advance this shared framework for regional growth management planning..."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Clarified.</p>
0001786.30	<p>#36 Clarification, p. 29; paragraph 3 "This data was mapped and functioned as a key informational resource during local review along with the PDAs. As a result of this process, growth in overlapping GRRAs has been de-emphasized but not completely [insert] eliminated in [end insert] eliminated n the Connect SoCal 2024 forecasted development [insert] pattern.[end insert] pattern,"</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The requested revision will be made in Section 5.3 of the Land Use and Communities Technical Report.</p>

ID	COMMENT	RESPONSE
0001786.31	<p>#37 Clarification, p. 29; paragraph 5; sentences 3-4 "CoSMoS is an online mapping viewer that makes detailed predictions over large geographic scales of storm-induced coastal flooding and erosion for both current sea level rise (SLR) scenarios. The data included in this [insert] technical report [end insert] [strikeout] book depicts [end strikeout] the potential inundation of coastal areas resulting"</p> <ul style="list-style-type: none"> • What are the "both" scenarios? <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>This is an error, and additional text has been added to specify that CosMos data utilized for Connect SoCal reflects a 3.28 foot increase in sea level rise without beach nourishment. The CosMos tool provides various scenarios on the impacts of sea level rise based on local actions to mitigate risks.</p>
0001786.32	<p>#38 Clarification, p. 34; paragraph 3; sentence 2 "Local jurisdictions were then engaged for review and feedback that was then [insert] incorporated [end insert] [strikeout] integrated [end strikeout] to best reflect local plans and conditions."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Clarified.</p>
0001786.33	<p>#39 Clarification, p. 35; Map 6 Explain what is being shown or add a note referring the reader to the specific section that explains the map</p>	<p>Under Section 5.5, second paragraph, second sentence, (Map 6) is now called out. Additional language explaining the map is also included.</p>
0001786.34	<p>#40 Correction, p. 36; paragraph 1; sentence 4 "132 local jurisdictions provided input on SCAG's draft growth forecast, while 148 percent provided input on other data elements such as GIS maps or surveys." • Correct the 148 percent</p>	<p>"148 percent" has been changed to "48 percent".</p>
0001786.35	<p>#41 Clarification, p. 37; "Data– For the one question assessing data collected by local jurisdictions, the most common are: Local road pavement management and performance data (52 jurisdictions), Collision data (51 jurisdictions) and Pavement Condition Index (49 jurisdictions)." • Please clarify</p>	<p>Comment noted. Sentence restructured to reflect the following clarification: "As local data is integral to the regional plan, SCAG asked what types of data are collected by local jurisdictions. The most common are: Local road pavement management and performance data (52 jurisdictions), Collision data (51 jurisdictions) and Pavement Condition Index (49 jurisdictions)."</p>
0001786.36	<p>#42 Clarification, p. 37; paragraph 1 "To ensure that the local edits to the development pattern appeared on-track to reach SCS objectives, , SCAG conducted a sketch-planning evaluation with the assistance of the Technical Working Group (TWG), [insert] which [end insert] [strikeout] this [end strikeout] occurred prior to development of subsequent Connect SoCal 2024 strategies and [insert] modeling26. [end insert] [strikeout] modeling26 [end strikeout] According to this evaluation, the FRDP has slightly less growth in the most prioritized areas [insert] (steps 1-3 representing areas with more than one PDA and no GRRAs) [end insert] than the preliminary projection [strikeout] (steps 1-3 representing areas with more than one PDA and no GRRAs)[end strikeout]; however, its performance exceeded that of the final, adopted Connect SoCal 2020. Similarly, the share of growth in [insert] areas with [end insert] no more than one GRRAs increased from 88 percent to 90 percent compared to the prior plan (Figure 1)."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Clarified.</p>
0001786.37	<p>#43 Clarification, p. 37; Figure 1 Add note under figure with definitions of acronyms as figures can be pulled out as standalone items. Change title or add note explaining more about what the figure represents.</p>	<p>Clarified.</p>

ID	COMMENT	RESPONSE
0001786.38	<p>#44 Clarification, p. 37; Figure 1</p> <p>"On April 20, 2023, the TWG discussed the FRDP [strikeout] and along [end strikeout] with staff [insert] and [end insert] it was determined to be sufficiently able to further the plan's statutory objective to proceed with subsequent modeling and regional policy development."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Clarified.
0001786.39	<p>#45 Clarification, p. 38; Map 7</p> <p>"Source: SCAG 2023. Priority areas refer to [insert] an area with [end insert] more than one PDA and no GRRAs. Resource areas refer to two or more GRRAs.</p> <p>Add language to map and/or map page "Note: The forecasted land use development patterns shown are based on Transportation Analysis Zone- (TAZ) level data developed and utilized to conduct required modeling analyses. Data at the jurisdiction level or at another geography smaller than the jurisdictional level, including TAZ, are advisory only and non-binding because they are developed only to conduct required modeling. The TAZ-level growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024's SED at any geographic level."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. Source section updated to reflect "Priority areas refer to an area with more than one PDA and no GRRAs. Resource areas refer to areas with two or more GRRAs.</p> <p>A TAZ disclaimer has been included in section 5.5 of the Land Use and Communities Technical Report.</p>
0001786.40	<p>#46 Clarification, p. 39; paragraph 1; last sentence</p> <p>"In addition, the region [strikeout] will [end strikeout] [insert] can [end insert] grow sustainably by incorporating climate resilience [insert] strategies [end insert] and [insert] promoting and reasonably pursuing [end insert] natural and farmland conservation, and broad complete communities strategies, including the concept of 15-minute communities."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>The last sentence in paragraph 1 of section 6 now reads: In addition, the region can grow sustainably by incorporating climate resilience strategies and promoting and reasonably pursuing natural and farmland conservation, and broad complete communities strategies, including the concept of 15-minute communities.</p>
0001786.41	<p>#47 Clarification, p. 43; paragraph 1 under Natural and Farmland Preservation)</p> <p>"Preserving [insert] and most reasonably utilizing [end insert] the region's natural and farmlands will ensure that future generations will be able to enjoy Southern California's unique landscapes as we do, and benefit from the essential resources that natural lands provide."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Comment noted.
0001786.42	<p>#48 Clarification, p. 44; paragraph 3</p> <p>"Connect SoCal anticipates [insert] and projects [end insert] that some of the existing natural and farmlands in the region will convert to urban uses as the region grows to accommodate 1.6 million additional households."</p> <p>[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Comment noted. Text is revised from "Connect SoCal anticipates that some of the existing natural and farmlands in the region will convert to urban uses as the region grows to accommodate 1.6 million additional households" to "Connect SoCal projects that some of the existing natural and farmlands in the region will convert to urban uses as the region grows to accommodate 1.6 million additional households."</p>

ID	COMMENT	RESPONSE
0001786.43	<p data-bbox="205 90 548 118">#49 Clarification, p. 44; paragraph 5</p> <p data-bbox="205 147 1129 345">“For natural lands, 48,590 acres are anticipated [insert] and projected [end insert] to be converted to urban uses by 2050 from existing conditions. This represents 617 acres more than the Trend/Baseline and is consistent with jurisdictional feedback on locally anticipated growth. With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 18,032 acres of degraded habitat - 1,202 acres more than the Trend/Baseline. Some areas are improved, however, as Connect SoCal will result in [insert] a projected [end insert] 1,891 acres of improved habitat - 666 acres more than the Trend/Baseline.”</p> <p data-bbox="205 375 1129 431">[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Comment noted. Text is revised to reflect this comment.
0001786.44	<p data-bbox="205 440 548 467">#50 Clarification, p. 44; paragraph 6</p> <p data-bbox="205 496 1129 748">“For agricultural areas, specifically, implementation of Connect SoCal [insert] would [end insert] [strikeout] will [end strikeout] result in [insert] the projected [end insert] conversion of 8,156 acres to urban uses - a [insert] projected [end insert] loss of an additional 1,464 acres of farmland over the Trend/Baseline. There [strikeout] are [end strikeout] [insert] would be [end insert] economic impacts due to this projected loss of farmland, where agricultural production value is anticipated to decline by roughly \$9 million through year 2050 compared to the Trend/Baseline. With this [insert] Plan’s projected [end insert] loss of both natural and farmlands, groundwater recharge is anticipated to decline by 129,326 acre-feet - 24,862 more acre-feet than the Trend/Baseline scenario.”</p> <p data-bbox="205 777 1129 837">[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Comment noted. Text is revised to reflect this comment.
0001786.45	<p data-bbox="205 846 422 873">#51 Clarification, p. 46</p> <p data-bbox="205 873 919 902">Asterisks are used in the bulleted lists but are not explained. Please explain.</p>	Comment noted. Asterisks have been removed
0001786.46	<p data-bbox="205 911 548 938">#52 Clarification, p. 47; paragraph 2</p> <p data-bbox="205 967 1129 1252">“Tax increment financing which includes but is not limited to Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), Neighborhood Infill Finance and Transit Improvements Districts (NIFTIs), and Affordable Housing Authorities (AHAs) is a tool that can allow local jurisdictions and public agencies to collaborate on achieving infrastructure, mobility, economic development, sustainability, and housing goals by leveraging tax increment (captures generated property tax as a result of invested dollars) to fund multifamily affordable housing, transit/rail capital projects, Transit-Oriented Development, Complete Streets capital projects, parking, parks and open space, and programs to reduce GHG emissions and VMT within TPAs. SCAG has supported [insert] the [end insert] establishment of several EIFD districts in the SCAG region through funding and technical assistance programs.”</p> <ul data-bbox="205 1252 814 1279" style="list-style-type: none"> • Sentence 1 is a very long sentence. Try to break up if possible. <p data-bbox="205 1308 1129 1367">[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Comment noted. Sentence modified to split into two sentences: Tax increment financing is a tool that can allow local jurisdictions and public agencies to collaborate on achieving infrastructure, mobility, economic development, sustainability, and housing goals by leveraging tax increment (captures generated property tax as a result of invested dollars) to fund multifamily affordable housing, transit/rail capital projects, Transit-Oriented Development, Complete Streets capital projects, parking, parks and open space, and programs to reduce GHG emissions and VMT within TPAs. Some examples of Tax Increment Financing includes but is not limited to Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), Neighborhood Infill Finance and Transit Improvements Districts (NIFTIs), and Affordable Housing Authorities (AHAs).

ID	COMMENT	RESPONSE
0001786.47	<p data-bbox="212 94 527 118">#53 Clarification, p. 50; last bullet</p> <p data-bbox="212 151 1100 232">"[insert] Support the development of [end insert] [strikeout] Develop [end strikeout] housing in areas with existing and planned infrastructure, availability of multimodal options, and where a critical mass of activity can promote location efficiency.</p> <p data-bbox="212 264 1129 321">[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Comment noted. Replace "Develop" with "Support the development of"
0001786.48	<p data-bbox="212 329 422 354">#54 Clarification, p. 51</p> <p data-bbox="212 362 737 386">What is the reduction in GHG? This should be called out</p>	Comment noted. For more details on Connect SoCal's specific GHG reduction strategies, see the Performance Monitoring Technical Report.
0001786.49	<p data-bbox="212 394 506 418">#55 Clarification, p. 51; bullet 2</p> <p data-bbox="212 451 1108 654">"Improved pedestrian infrastructure - Pedestrian oriented design can create a more accessible and connected environment to key destinations and activity centers, increase transit ridership, and reduce the number of single-occupant trips. Continuous and cohesive sidewalk networks improve the safety and comfort of streets, enabling people of all ages and abilities to get where they want to go. Improving walkability often means [insert] installing [end insert] [strikeout] implementing [end strikeout] new sidewalks, improving the quality of existing sidewalks and including street trees and other amenities."</p> <p data-bbox="212 686 1129 735">[See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	Comment noted. Will replace "implementing" with "installing"
0001786.50	<p data-bbox="212 743 506 768">#56 Clarification, p. 51; bullet 3</p> <p data-bbox="212 776 1129 857">"Co-working ...This strategy was developed using a very conservative assumption that a small portion of long-distance commuters would substitute a single day per week of their commute for a co-working site within three miles of their home."</p> <ul data-bbox="212 865 1087 914" style="list-style-type: none"> • Are these co-working sites new? Informal? Is there some sort of inventory of these now? Are more expected/planned? 	Co-working has been removed from the list of strategies for the final Connect SoCal 2024.
0001786.51	<p data-bbox="212 922 520 946">#57 Clarification, p. 58; bullet list</p> <p data-bbox="212 954 359 979">What are LDCs?</p>	Comment noted. LDCs (Land Development Categories) are defined on page 54 in the Land Use and Communities Technical Report.

ID	COMMENT	RESPONSE
0001786.52	<p data-bbox="191 87 541 118">#58 Clarification, p. 58 [part 1 of 3]</p> <p data-bbox="191 147 1115 626">“7.5 TAZ-Level Growth Forecast, Growth Vision, and SCS Consistency In order to assess the ability of the Connect SoCal 2024 Plan to meet federal air quality standards and achieve a state greenhouse gas reduction target, SCAG creates small-area projections data for housing, population, and employment, which are known as the Tier 2 traffic analysis zone (TAZ) socioeconomic dataset (SED). Although these data are based in part on input provided by staff from local jurisdictions during the Connect SoCal 2024 Local Data Exchange process, local jurisdictions and projects within the region shall not be held to meet any specific numbers within or aggregates of the TAZ data. Connect SoCal 2024’s TAZ-level household and employment projections are created to provide estimated snapshots in time. These projections do not reflect subsequently available information (given that local jurisdictions provided their local input to SCAG between May and December 2022); and, concerning some jurisdictions, they also do not reflect all currently entitled and pending projects. Additionally, the TAZ data do not project the full build-out and realization of localities’ general plans; and they do not conform to jurisdictions’ current respective housing elements. The local plans and approvals have continued and will continue to evolve; and market forces will continue to play a major role in determining the timing, locations, and different types of development and redevelopment that will occur. Therefore, the applicable jurisdiction(s) should be contacted for the most up-to-date data available.</p> <p data-bbox="191 656 1115 854">The TAZ-level household and employment growth projection data are utilized to understand how regional policies and strategies may be reflected at the neighborhood level in a generally illustrative manner. They are advisory and non-binding because they are developed only to conduct required modeling. No jurisdiction has an obligation to change or conform its land use policies, general plan, housing element, zoning, regulations, or approvals of projects or plans, or consider or require mitigation measures or alternatives to be consistent with Connect SoCal 2024’s SED at any geographic level.</p> <p data-bbox="191 883 1115 964">SCAG’s forecasted regional development pattern (FRDP) is not solely based on the TAZ-level household and employment spatial projections. It is utilized to estimate the overall effect of the many policies, goals, and [...]</p>	<p data-bbox="1121 87 2053 147">This additional section has been added to the Land Use and Communities Technical Report to provide information on determinations of project consistency with Connect SoCal.</p>

ID	COMMENT	RESPONSE
0001786.53	<p data-bbox="191 87 541 115">#58 Clarification, p. 58 [part 2 of 3]</p> <p data-bbox="191 147 1115 289">[...] strategies of Connect SoCal—which should not be uncritically applied, individually or en masse, to any particular project or plan. The TAZ-level household and employment growth projections support the region’s ability to model conformity with federal air quality standards and its ability to achieve a state greenhouse gas reduction target; they do not, however, reflect the only set of growth assumptions that may meet these standards and that target.</p> <p data-bbox="191 321 1115 516">Therefore, insofar as housing and other laws or grants may require comparisons of projects or plans to Connect SoCal 2024, SCAG’s projections that are illustrated in TAZ maps—along with any related documents or modeling outputs—may not be used to determine the inconsistency of any plan or project in the region with Connect SoCal 2024. Given that land use decisions are properly made with attention to local contexts and circumstances, local jurisdictions and other lead agencies shall have the sole discretion to determine a local project’s or plan’s general consistency and overall alignment with Connect SoCal.</p> <p data-bbox="191 548 1115 881">For example, local jurisdictions’ plans and approvals may be found to align with Connect SoCal 2024 if they directionally support a number of its objectives, such as by encouraging a mix of housing types that includes more affordable and multi-family housing rather than solely single-family, for-sale housing; providing for more housing located proximate to employment or vice versa; or encouraging increased use of transit, ridesharing, biking, walking or micro-mobility, or hybrid and remote work to reduce commuting trips. Such alignment is an appropriate basis for a local jurisdiction to determine that a plan or project is consistent with Connect SoCal 2024. Such determinations should be evaluated based on (i) the totality of the goals, policies, and objectives of Connect SoCal 2024 and its associated Program Environmental Impact Report (PEIR), and (ii) the attributes of the local project or plan in overall relation to Connect SoCal, and not in a prescriptive manner by applying SCAG’s TAZ-level data, any aggregate thereof, or any particular one or more goals, policies, or objectives of Connect SoCal 2024 and its associated PEIR. [...]</p>	<p data-bbox="1121 87 2053 1461">This additional section has been added to the Land Use and Communities Technical Report to provide information on determinations of project consistency with Connect SoCal.</p>
0001786.54	<p data-bbox="191 914 541 941">#58 Clarification, p. 58 [part 3 of 3]</p> <p data-bbox="191 974 1115 1169">[...] This flows logically from the fact that Connect SoCal 2024 includes dozens of stated directives, policies, goals, objectives, and measurements, any number of which may not be individually applicable to any given project or plan. For example, a project that provides new housing units in conformity with a jurisdiction’s approved housing element can and should be found to be in overall alignment with Connect SoCal 2024 given housing production’s contribution to Connect SoCal 2024 goals and policies, especially those related to affirmatively furthering fair housing, social and economic justice, jobs-housing balance, and the like.</p> <p data-bbox="191 1201 1115 1456">Household or employment growth included in the Connect SoCal 2024 TAZ-level SED and maps may assist in determining consistency with the SCS for purposes of determining a project’s eligibility for CEQA streamlining under SB 375 (Cal. Govt. Code § 21155(a)). TAZ-level maps and data may not otherwise be used or applied prescriptively to determine that a project is inconsistent or not in alignment with Connect SoCal 2024 for any purpose, given that myriad other development assumptions could also be found to be consistent or, on balance, aligned with the SCS. Specifically, the TAZ-level data and maps do not supersede or otherwise affect locally approved housing elements, including those adopted in compliance with the 6th Cycle of the Regional Housing Needs Assessment (RHNA).”</p>	<p data-bbox="1121 914 2053 1456">This additional section has been added to the Land Use and Communities Technical Report to provide information on determinations of project consistency with Connect SoCal.</p>

ID	COMMENT	RESPONSE
0001786.55	#59 Clarification, p. 59 SCAG should explain on this page how we are meeting the GHG reduction targets. Supply the metric associated with Land Use	Comment noted. For more details on specific GHG reduction strategies, see the Performance Monitoring Technical Report.
0001786.56	#60 Clarification, p. 61; endnote "25-At the time of [insert] the release of the initial growth [end insert] [strikeout] preliminary forecast [strikeout] development ([strikeout] April [end insert] [insert] May [end insert] 2022), only 12 of the region's 197 jurisdictions had 6th cycle housing elements [strikeout] which [end strikeout] [insert] that [end insert] had been adopted and certified by the state. While local jurisdictions were requested to consider housing element updates in their review of LDX growth data, only 87 had adopted and certified housing elements [strikeout] even [end strikeout] by [strikeout] the [end strikeout] January 2023, immediately after the deadline for LDX input. Additionally, some local jurisdictions may not be required to complete rezonings associated with housing element updates until October 2024, rendering data on newly available sites inherently incomplete (or unavailable) for the purposes of Connect SoCal 2024. • Is the October 2024 date accurate? The statement is unclear on if some jurisdictions have other deadlines before or after the date mentioned. Please check dates against statute and update as applicable throughout all documents regarding this topic. [See Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS in attachment for denoted edits.]	This has been verified and corrected. Jurisdictions who had compliant housing elements by an October 2022 deadline will have until February 2025 to complete any re-zonings associated with 6th cycle housing element updates; this marks the latest possible time point at which zoning-related data stemming from the 6th cycle of RHNA would be available.
Submitted by	Orange County Council of Governments	Submittal 0001787
0001787.01.1	Table 11: Mobility Technical Report Comments #1 General Comment, All pages Add "2024" to all technical report page headers' titles	Technical report page headers' titles have been updated to include "2024".
0001787.01.2	#2 General Comment, All pages In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data	Sources have been updated to reference the original data source, where applicable.
0001787.01.3	#3 General Comment, All pages Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.	Comment noted. The text has been updated to capitalize "Plan" where applicable.
0001787.01.4	#4 General Comment, All pages For data that is not derived from Connect SoCal models, cite source.	Sources have been updated to reference the original data source, where applicable.
0001787.01.5	#5 General Comment, If definitions come from specific source or statute, include the reference in the narrative.	Comment noted. References to specific sources or statutes for a given definition have been updated, where feasible.
0001787.01.6	#6 General Comment, All pages Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.	Comment noted. Data on existing and planned infrastructure capacity, such as water and sewer capacity, are not available at the local and neighborhood levels.
0001787.01.7	#7 General Comment, All pages Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.	Where applicable, SCAG has added text to tables and graphics to reflect where numbers may not sum due to rounding.

ID	COMMENT	RESPONSE
0001787.02	<p>#8 4.3.2: Existing Transportation System: Local Streets and Roads, p.205</p> <p>Please clarify if the definition and discussion on local streets and roads pertains only to public local streets and roads, or if it also includes privately-owned streets. With the discussion on maintenance needs and funding sources, it appears that the discussion pertains to only public local streets and roads, and the reference to "public" is recommended to be included in the narrative.</p>	<p>This section includes a clarification that local streets and roads are typically owned and operated by local jurisdictions; thus, the discussion contained in this section pertains only to public local streets and roads in the SCAG region.</p>
0001787.03	<p>#9 4.6.1: Declining Infrastructure, Figure 4-4, p. 211</p> <p>Figure 4.4: 2022 Bridge Conditions in the SCAG Region, is missing an information label for the "Y" axis. What do these numbers on bridge condition for each of the six SCAG counties represent?</p>	<p>The number represents number of bridges in Good, Fair, and Poor Condition.</p>
0001787.04	<p>#10 4.6.2: Congestion and Delay: Daily Person Hours of Delay, p. 212, 213; Figure 4-6</p> <p>The narrative discussing person hours of delay by facility type (page 212, last paragraph) does not match with the information presented in the corresponding Figure 4-6 on page 213. Please re-check the percentages called out in the narrative, against the calculation of percentages with the data in Figure 4-6 on daily person-hours of delay between Base Line (2050) and the Plan (2050).</p> <p>"Connect SoCal 2024 plan investments are estimated to decrease daily person-hours of delay of 17 percent overall, [strikeout] highway and[end strikeout] 21.7 percent on highways and 8 percent on arterials compared to [insert]Base Year[end insert] [strikeout] Baseline[end strikeout] conditions." Or</p> <p>"Connect SoCal 2024 plan investments are estimated to decrease daily person-hours of delay of [insert]20 [end insert][strikeout] 17 [end strikeout]percent overall, [strikeout] highway and[end strikeout] [insert]19.2 [end insert][strikeout] 21.7 [end strikeout]percent on highways and [insert]17.8[end insert] [strikeout] 8 [end strikeout]percent on arterials compared to Baseline conditions."</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Figure 4-6 demonstrates delay by hours of delay and the corresponding text translates hours of delay to percentages for explanation purposes. SCAG is revising the title for the Figure 4-6 and will update the data underlying the figure to align with the data that is presented elsewhere in the Plan (see: Performance Monitoring Technical Report). SCAG will check to confirm that the in-text description accompanying the figure aligns with the updated figure.</p>
0001787.05	<p>#11 4.6.2: Congestion and Delay: Truck Delay by Facility Type, p.213, 214 Figure 4-7</p> <p>The narrative discussing average daily truck delay by facility type (page 213, last paragraph) does not match with the information presented in the corresponding Figure 4-7 on page 214. Please re-check the percentages called out in the narrative, against the calculation of percentages with the data in Figure 4-7 on truck delay by facility type, between Base Line (2050) and the Plan (2050).</p> <p>"Connect SoCal 2024 is estimated to reduce truck delay by 19 percent over Baseline conditions for the category of highway/expressway, with [insert]13.8[end insert][strikeout] 18.1[end strikeout] percent over Baseline conditions for the arterials [insert]and 18.1 percent overall[end insert]."</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>Figure 4-7 demonstrates delay by hours of delay and the corresponding text translates hours of delay to percentages for explanation purposes. SCAG is revising the title of Figure 4-7 to indicate that it demonstrates delay by hours and will update the data underlying the figure to align with the data that is presented elsewhere in the Plan (see: Performance Monitoring Technical Report). SCAG is working to align the accompanying in-text description with the updated figure.</p>
0001787.06	<p>#12 4.6.6: Speed Management, p. 217</p> <p>The last paragraph of this section discusses AB 645's pilot program for speed management. Since several SCAG local jurisdictions will be participating in the pilot program, a call-out of the participating jurisdictions is recommended.</p>	<p>SCAG is adding a call-out for the local jurisdictions that will be participating.</p>

ID	COMMENT	RESPONSE
0001787.07	<p>#13 4.9.3: Performance Measure 2: Pavement and Bridge p. 228, 229 Figure 4-10: State Figure 4-11: SCAG</p> <p>The narrative on page 228 discusses the pavement conditions of the State and SCAG region, for roads and bridges. Noting that most of the pavement condition falls within the Fair category, is there a reason why Figure 4-10 and Figure 4-11 do not display any information on the Fair Category, and only focus on the Good and Poor pavement and bridge conditions?</p>	<p>Comment noted. The Federal MAP-21 measures PM 2 require reporting of Good and Poor Pavement and Bridge conditions. The balance of Good and Poor is assumed to be considered as fair condition.</p>
0001787.08	<p>#14 4.10: Where Do We Go From Here?, p. 233, 235</p> <p>The first full paragraph on page 233 states that "...the cost of rebuilding roadways [insert]pavement[end insert] could be 14 times more than preventive maintenance."</p> <p>4.10.4 Smart Cities Later, on page 236, third bullet, the technical report states that "The cost of rebuilding roadways [insert]pavement[end insert] is exceptionally more (up to eight times more) than preventative maintenance."</p> <p>Please re-examine the differing percentages, and reconcile.</p> <p>[See Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS in attachment for denoted edits.]</p>	<p>SCAG is revising the statement under section 4.10.4 bullet 3 to read: "The cost of rebuilding roadways is exceptionally more (up to 14 times more) than preventative maintenance."</p>
Submitted by	Orange County Council of Governments	Submittal 0001788
0001788.01	<p>Table 12: Performance Monitoring Technical Report Comments</p> <p>#1, General Comment, All Pages</p> <p>Add "2024" to all technical report page headers' titles</p>	<p>Technical report page headers' titles have been updated to include "2024".</p>
0001788.02	<p>#2 General Comment, All Pages</p> <p>In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data</p>	<p>Sources have been updated to reference the original data source, where applicable.</p>
0001788.03	<p>#3, General Comment, All Pages</p> <p>Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.</p>	<p>Comment noted. The text has been updated to capitalize "Plan" where applicable.</p>
0001788.04	<p>#4 General Comment, All pages</p> <p>For data that is not derived from Connect SoCal models, cite source.</p>	<p>Sources have been updated to reference the original data source, where applicable.</p>
0001788.05	<p>#5 General Comment, All Pages</p> <p>If definitions come from specific source or statute, include the reference in the narrative.</p>	<p>Comment noted. References to specific sources or statutes for a given definition have been updated, where feasible.</p>

ID	COMMENT	RESPONSE
0001788.06	<p>#6 General Comment, All Pages</p> <p>Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</p>	<p>Comment noted. Data on existing and planned infrastructure capacity, such as water and sewer capacity, are not available at the local and neighborhood levels.</p>
0001788.07	<p>#7 General Comment, All Pages</p> <p>Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.</p>	<p>Where applicable, SCAG has added text to tables and graphics to reflect where numbers may not sum due to rounding.</p>
0001788.08	<p>#8 Clarification, p. 2; paragraph 1 Section 1.2: Connect SoCal 2024 Performance Summary</p> <p>"The plan performance assessment demonstrates that implementation of Connect SoCal 2024 will propel the region toward achievement of the identified goals for nearly every identified plan performance measure."</p>	<p>Comment noted. We will make the recommended edit in the final Connect SoCal.</p>
0001788.09	<p>#9 Clarification, p. 3</p> <p>Average trip on distance (all modes)</p> <p>Table 1: Connect SoCal 2024 Performance Assessment Results</p> <p>In the Average trip distance (all modes) performance measure, is "miles" the measure that is used for the average trip distance shown in the reporting years? If so, please add the reference to "miles" in the appropriate table columns for this measure.</p>	<p>Comment noted. The referenced table will be updated to clarify that miles is the unit of measure for the average distance traveled performance measure.</p>
0001788.10	<p>#10 Clarification, p. 6 Share of Population Living in PDAs Table 2: Connect SoCal 2024 Co- Benefits</p> <p>Clarification is requested on the identification of "Savings" and "Change" for the Benefit Category of "Share of Population Living in PDAs".</p> <p>The Savings is identified as a 3.3% higher share of population living in PDAs, when comparing Connect SoCal to the Baseline.</p> <p>However, on the "Change" column, the entry is "+3.3 pct pts". Is that not the same as saying +3.3%?</p>	<p>Comment noted. SCAG reports changes in percentages for the Connect SoCal performance measures in terms of percentage points to provide clarity that the difference being reported is not an actual percent change from the baseline performance. For example, for the population residing within PDAs metric, while there is a 3.3 percentage point difference between the baseline (57.2%) and Connect SoCal (60.5%), the percent change between these two values would be 5.8%.</p>
0001788.11	<p>#11 Clarification, p. 17, p. 72</p> <p>ADU Development, Table 6: Connect SoCal 2024 On- Going Monitoring Performance Measures</p> <p>In Table 6, this ADU-related performance measure is described as "Number of ADU units developed within Priority Development Areas (PDAs)."</p> <p>Further, within the page 72 narrative on this performance measure, the text states that "This new metric will track the number of ADUs developed in each county within the SCAG region over the Connect SoCal 2024 plan horizon."</p> <p>If this is to be a tracking measure, SCAG should clearly define what it is that would be tracked and use that descriptor in Table 6 and in the narrative on page 72. For example, is the tracking measure to be ADU approvals? Building permits? Building finals?</p>	<p>Comment noted. ADU development is a new performance measure being introduced for Connect SoCal 2024. The measure will monitor the number of ADU units developed within Priority Development Areas throughout the SCAG region. Regional ADU performance will be monitored over time through use of the HCD housing progress report dashboard: https://www.hcd.ca.gov/planning-and-community-development/housing-open-data-tools/housing-element-implementation-and-apr-dashboard) for tracking ADU approvals, permits, & completions. The description of the ADU measure is presented in the table and narrative.</p>

ID	COMMENT	RESPONSE
0001788.12	<p>#12 Clarification, p. 17, p. 75 Urban Heat Island Reduction Strategies</p> <p>Table 6: In Table 6, there is an "Urban Heat Island Reduction Strategies" performance measure.</p> <p>The description provided in Table 6 and further discussed on page 75 identifies that the strategy is based on the implementation of urban tree canopy. How will this data be captured by SCAG, to be able to report on progress of this performance measure? Is there a specific data source(s) that would be used, or is this to be based on information from local governments in the SCAG region? Please clarify.</p>	<p>Comment noted. The Urban Heat Island Reduction Strategies metric is a new performance measure introduced for Connect SoCal 2024. The primary resource used to support the ongoing monitoring of regional performance related to this new measure will be the USDA National Land Cover Dataset: https://data.fs.usda.gov/geodata/rastergateway/treecanopycover/#table1 for monitoring tree canopy coverage. Information provided by local and regional planning agencies throughout the SCAG region will also support the monitoring of urban heat island reduction strategies over time.</p>
0001788.13	<p>#13 Correction, p. 45</p> <p>Repetitive language "Priority Development Areas (PDAs) are areas that offer high levels of accessibility and connectivity to job centers and other primary destinations and opportunities that offer high levels of accessibility and connectivity to job centers and other primary destinations and opportunities."</p>	<p>Comment noted. The repetitious sentence will be removed from the final Connect SoCal.</p>
0001788.14	<p>#14 Clarification, p. 69</p> <p>The housing crisis not just in California or SCAG region. Change to "Due to the housing crisis, [insert] which is not limited to just [insert ends] in Southern California or the SCAG region..."</p>	<p>Comment noted. We will make the recommended revision in the Performance Monitoring Technical Report.</p>
0001788.15	<p>#15, Clarification p87</p> <p>The analysis for the increase in bicycle-related serious injuries and fatalities should consider and discuss the increased use of e-bikes, especially the increased use of e-bikes by people of a younger age and less decision-making skills. This may be evidenced by looking at the age of the injured/killed and referencing recent attempts at licensing in state legislation. In addition to Connect SoCal 2024 serving "as a catalyst toward improved regional bicycle safety performance", can it (or SCAG) also serve as a catalyst for bicycle safety education and/or licensing?</p>	<p>Comment noted. SCAG considers bicycle and pedestrian safety a high regional priority. SCAG's successful 'Go Human' campaign actively funds and supports and funds bicycle safety educational outreach efforts throughout the region. Your comment regarding the increased use of e-bikes among younger persons is deserving of further study.</p>

ID	COMMENT	RESPONSE
0001788.16	<p>#16, Clarification,p. 113-114 Section 7.4.3 GHG Emissions Reduction Measure</p> <p>The narrative states that "A new performance measure was proposed for inclusion in the PM 3 program that will require the monitoring and reporting of surface transportation-related GHG emissions reductions." The narrative further states that "the proposed new GHG emissions reduction performance measure would require Caltrans to establish two- and four-year statewide targets, while SCAG would establish four-year regional targets for reducing tailpipe CO2 emissions on the NHS."</p> <p>The narrative further states that final FHWA rulemaking is expected in November 2023.</p> <p>At present, is it correct to state that:</p> <ul style="list-style-type: none"> a) the current inventory of performance measures presented in this Technical Report does not include this new federal GHG performance measure; b) the GHG Emissions performance measure listed in Table 4: Connect SoCal 2024 Plan Performance Assessment Measures (page 11), is the California Air Resources Board's GHG emissions reduction target for the SCAG region; and, c) the new federal GHG emissions reduction target could possibly be added to this Technical Report as a new performance measure, if the federal Rulemaking is accomplished in time? 	<p>Comment noted. Your request for clarification regarding the new federal GHG emissions reduction performance measure will be addressed in the final Connect SoCal 2024. While statewide and regional performance targets in support of the new federal GHG metric had not yet been established at the time of this publication, updated information regarding the GHG performance measure will be included in the Federal System Performance Report section of the Connect SoCal Performance Monitoring Technical Report.</p>
Submitted by	Orange County Council of Governments	Submittal 0001789
0001789.01	<p>Table 13: Project List Technical Report Comments</p> <p>#1 General Comment, All pages Add "2024" to all technical report page headers' titles</p>	<p>Technical report page headers' titles have been updated to include "2024".</p>
0001789.02	<p>#2 Correction, All pages 2-430 Change "\$1000's" to "\$1,000s"</p>	<p>Comment noted.</p>
0001789.03	<p>#3 Correction, p. 100; Table 1 Table 1, Row 9, ORA111207, Project cost should be \$423,000 (per FTIP amendment #23-11)</p>	<p>FTIP ID #ORA111207 is updated in Table 1 of the Final Project List Technical Reprt to reflect the current project cost per the most recently approved 2023 FTIP. Table 1 of the Draft Project List Technical Report reflected project costs prior to FTIP Amendment #23-11.</p>
0001789.04	<p>#4 Correction, p. 257 RTP ID 2T01135, Lead Agency should be "Various Agencies" and Project Cost should be \$423,000</p>	<p>Comment noted. Please see response to Comment #0001751.05.</p>
Submitted by	Orange County Council of Governments	Submittal 0001790
0001790.01	<p>Table 14: Public Participation and Consultation Technical Report Comments</p> <p>#1 General Comment All Pages Add "2024" to all technical report page headers' titles</p>	<p>Technical report page headers' titles have been updated to include "2024".</p>
0001790.02	<p>#2 General Comment All Pages In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data</p>	<p>Sources have been updated to reference the original data source, where applicable.</p>

ID	COMMENT	RESPONSE
0001790.03	#3 General Comment All Pages Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.	Comment noted. The text has been updated to capitalize "Plan" where applicable.
0001790.04	#4 General Comment, All Pages For data that is not derived from Connect SoCal models, cite source.	Sources have been updated to reference the original data source, where applicable.
0001790.05	#5 General Comment All Pages If definitions come from specific source or statute, include the reference in the narrative.	Comment noted. References to specific sources or statutes for a given definition have been updated, where feasible.
0001790.06	#6, Clarification p. 10; Section 9.1. Survey Findings, first sentence, Clarify if respondents had the opportunity to take the survey more than once. If so, did the 3,683 "completed surveys" actually come from 3,683 respondents? If not, that should be mentioned in the paragraph.	This text has been edited to clarify that there were 3,683 unique surveys completed. Staff found no evidence in the survey responses that respondents completed multiple surveys.
0001790.07	#7 Clarification p. 10; Figure 1. Survey Responses by County Figure 1 shows that 50% of the survey respondents came from the County of LA. As such, the response are skewed and more LA-centric, which should be noted somewhere in this technical report when discussing survey results.	Comment noted. Consultation, as defined within Comment noted. The Public Participation and Consultation Technical Report is updated to reflect that over 50 percent of the respondents who indicated their county selected Los Angeles.
Submitted by	Orange County Council of Governments	Submittal 0001791
0001791.01	Table 15: Transportation Conformity Analysis Technical #1 General Comment, All Pages Add "2024" to all technical report page headers' titles	Technical report page headers' titles have been updated to include "2024".
0001791.02	#2, General Comment, All Pages In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data	Sources have been updated to reference the original data source, where applicable.
0001791.03	#3 General Comment, All Pages Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.	Comment noted. The text has been updated to capitalize "Plan" where applicable.
0001791.04	#4 General Comment All Pages For data that is not derived from Connect SoCal models, cite source.	Sources have been updated to reference the original data source, where applicable.
0001791.05	#5 General Comment All pages If definitions come from specific source or statute, include the reference in the narrative.	Comment noted. References to specific sources or statutes for a given definition have been updated, where feasible.
0001791.06	#6 General Comment All Pages Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.	Comment noted. Data on existing and planned infrastructure capacity, such as water and sewer capacity, are not available at the local and neighborhood levels.

ID	COMMENT	RESPONSE
0001791.07	<p>#7 General Comment All Pages</p> <p>Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.</p>	Where applicable, SCAG has added text to tables and graphics to reflect where numbers may not sum due to rounding.
0001791.08	<p>#8 Correction All Pages</p> <p>References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”</p>	Citations to the American Community Survey dataset are revised to use the word “estimates” where appropriate.
0001791.09	<p>#9, Correction p. 23 & 41 (2 occurrences)</p> <p>“2020 Decennial Census PL-94 171 Redistricting File” Change to “2020 Decennial Census P.L. 94-171 Redistricting File”</p>	Text is revised from “2020 Decennial Census PL-94 171 Redistricting File” to “2020 Decennial Census P.L. 94-171 Redistricting File” in the Transportation Conformity Analysis Technical Report where appropriate.
Submitted by	Orange County Council of Governments	Submittal 0001792
0001792.01	<p>Table 16 Transportation Financing Technical Report Comments</p> <p>#1 General Comment, All pages</p> <p>Add “2024” to all technical report page headers’ titles</p>	Technical report page headers’ titles have been updated to include “2024”.
0001792.02	<p>#2 General Comment, All pages</p> <p>In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don’t cite SCAG’s Local Profiles if original data source is U.S. Census Bureau American Community Survey data</p>	Sources have been updated to reference the original data source, where applicable.
0001792.03	<p>#3 General Comment, All pages</p> <p>Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.</p>	Comment noted. The text has been updated to capitalize “Plan” where applicable.
0001792.04	<p>#4, General Comment, All Pages</p> <p>For data that is not derived from Connect SoCal models, cite source.</p>	Sources have been updated to reference the original data source, where applicable.
0001792.05	<p>#5, General Comment, All Pages</p> <p>If definitions come from specific source or statute, include the reference in the narrative.</p>	Comment noted. References to specific sources or statutes for a given definition have been updated, where feasible.
0001792.06	<p>#6, General Comment, All Pages</p> <p>Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</p>	Comment noted. Data on existing and planned infrastructure capacity, such as water and sewer capacity, are not available at the local and neighborhood levels.
0001792.07	<p>#7, Clarification, p. 1, first paragraph</p> <p>“However, the IJA expires in Fiscal Year (FY)..” – specify it is “Federal” fiscal year.</p>	Comment noted.

ID	COMMENT	RESPONSE
0001792.08	<p>#8, Clarification, p. 1; 1. Introduction: Revenue sources</p> <p>Page 1, third paragraph, states that "Efforts are underway to explore how we can transition from our current system based on fuel taxes towards a more direct system of user fees." This sentence seems to downplay/contradict a preceding sentence which recognizes that local sales tax revenues for transportation purposes generate 58% of the region's core revenues, and highway tolls an additional 8%, according to Figure 6, page 10. Perhaps revise the reference of "based on" to a more appropriate reference.</p>	<p>Comment noted. In the draft Plan, local sales tax revenues account for 58% of the SCAG region's local core revenues, not total core revenues. (See Chapter 4 or the Transportation Finance Technical Report for final numbers.) The majority of core revenue sources in the plan are still funded with fuel taxes. SCAG acknowledges that a significant portion of funding in the plan comes from local sources, most notably local sales taxes for transportation. These local sources partially account for the historical decrease in purchasing power of traditional funding sources based on fuel taxes, especially before the passage of SB 1.</p>
0001792.09	<p>#9, Clarification, p. 2 1. Introduction: Equity Considerations of User Rees</p> <p>Page 2, first full paragraph, states that "SCAG further considers the potential equity concerns that accompany user fee policies and assumes mitigation measures such as the establishment of a mobility equity fund." Please clarify; in reviewing the mitigation measures in the Draft Program EIR, there does not seem to be any mitigation measure that addresses the equity considerations associated with any user-fee system of revenues (See PMM-TRA-2). Please also see related comments that are provided on the Draft Plan Equity Technical Report.</p>	<p>Language has been revised to clarify that the Mobility Equity Fund is not a CEQA mitigation measure.</p>
0001792.10	<p>#10, Clarification, P. 7, Sec 2.6 P. 9, Table 1 P. 16, Table 3.1 Core Revenues - Local</p> <p>Section 2.6 acknowledged that local sales taxes for three counties will expire during the term of the Plan, including Orange County's Measure M in 2041. However, the core revenue forecast shown in Table 1 show a significant increase in funding in OC for the period of FY2045-2050 (\$25.1 billions in FY2045-2050 compared to \$18.3 billions in FY 2040-2044 and \$17.6 billions in FY2035-2039. Recommend providing clarifying information on the disproportionate increase and local sales taxes assumptions beyond their expiration. If a continuation of existing sales tax revenue (or other new taxes) is assumed through FY2045-2050, recommend categorizing this revenue under new reasonably available revenues to better illustrate the need to secure future funding.</p>	<p>Comment noted. The last "bucket" (FY2045-FY2050) includes six years instead of five years because the Plan period is 26 years. The extra year, in combination with presenting the totals in nominal dollars, accounts for the appearance of a relative increase in that column. The Plan includes the assumption that Measure M2 ends in 2041.</p>
0001792.11	<p>#11, General Comment. 8, Appendix 1, p. 3</p> <p>Core and Reasonably Available Revenues, identify federal, state and local sources of transportation funding for the plan and Highway Tolls identify toll road revenues and mitigation fees. Nowhere in the document is the private sector funding contribution assumed for the plan described, although toll road widenings, and tolled express lane facilities that are privately funded are included in the plan and in the total cost of the plan. Accurately describing the extent of private funding is an important public disclosure, and an important element of the financial plan that relieves the burden on limited federal, state and local transportation funding.</p>	<p>Comment noted. To the extent that private funding is known for regionally significant projects, it has been included in the Plan. It is important to recognize the distinction between private funding and privately financed projects that rely on user fees. Private funding is described in the Plan, please see Table 4.3.</p>
0001792.12	<p>#12, Clarification, p. 11 & 12; Figure 8, 3.1: Core Revenues Federal The narrative on Federal sources of core revenues on page 11 states that FTA Formula and Discretionary funds cumulatively account for 61% of the federal funding for the SCAG region. Please confirm. In reviewing the referenced Figure 8, the sum of the two funds appears to be 58%.</p>	<p>The text in Section 3.1 and Figure 8 are revised to be consistent.</p>

ID	COMMENT	RESPONSE
0001792.13	<p>#13, Clarification, p. 12, 13 Tables 2-4 Table 3.4</p> <p>3.2: New Reasonably Available Revenues: Mileage-Based User Fee (Replacement) vs Local Road Charge Program</p> <p>a) This section of the technical report should include a figure, similar to Figures 1 through 8, that visually identify the amount of new revenue and the associated percentage of the total new revenues, that are being assumed and listed in Tables 2 - 4. And that per Figure 12 on page 33, new revenues represent \$162.2 million or 22% of the Connect SoCal 2024 total revenues of \$750 billion.</p> <p>b) The narrative discussion on New Reasonably Available Revenues on page 13 could also warrant more clarifying explanation about the distinction between the Mileage-based User Fee (Replacement) and the Local Road Charge Program. Technically, both are mileage-based fee programs: summarize the distinctions that are discussed in Tables 2 and 4, to assist the reader who is not going to delve into the detail of those tables, yet recognizing that both fees could be imposed on the driver starting in 2035. c) Table 4 includes a risk assessment of the proposed new sources of funding. The information in Table 4 should be referenced in the narrative discussion on page 13, to inform the reader of the potential risk analysis that was conducted for each new funding source and the risk mitigation measures identified.</p>	<p>Comment noted. New reasonably available revenue sources are initially presented in table form (Table 2) to provide greater clarity to the reader. Table 2 provides a description of each source, including assumed implementation date. Page 13 discusses new reasonably available revenue only. Table 4 provides availability assumptions and risk assessment for all revenue sources in Connect SoCal 2024, and follows descriptions and assumptions for all revenue sources included in the Plan.</p>
0001792.14	<p>#14, Clarification, P. 14-15, Table 2</p> <p>While the number is available later in the report, Table 2 should include the total sum of new reasonably available revenue.</p>	<p>Comment noted. Table 2 gives descriptions of new reasonably available revenues. Totals are presented in Table 3 for all revenue sources by type.</p>
0001792.15	<p>#15, Clarification, p. 26 4. Expenditures</p> <p>a) Page 26 of this section references a Figure 11 that represents the standardized template that the CTCs used to submit cost information for capital projects. Is it Figure 11 on page 32, or Figure 9 on page 26, that represents the standardized CTC template?</p> <p>b) Page 26 of this section references a Figure 12 to illustrate changes in California highway construction costs. Is it Figure 12 on page 33 or Figure 10 on page 21, that represents the change in California construction costs?</p>	<p>Text is updated to indicate that Figure 9 represents the standardized template for CTC capital submissions, and Figure 10 illustrates the change in California highway construction costs.</p>
0001792.16	<p>#16, P. 28, Table 5 P. 31, Table 6 Expenditure</p> <p>Both Table 5 and Table 6 refer to service expansion. Recommend adding language that differentiates what is included in each table. For example, specify infrastructure and equipment required for service expansion in Table 5. Also clarify if operating costs are included in Table 6 as the text description before it only suggests system preservation and maintenance needs</p>	<p>Table 6 is revised to clarify inclusion of operating costs. Capital costs of service expansion are included in Table 5. Operation and maintenance costs of service expansion are included in Table 6.</p>
0001792.17	<p>#17, Correction, p. 29</p> <p>Table 5, Highways, Add toll roads to HOV/Express Lanes/Toll Roads. This change should also be made elsewhere in the main RTP/SCS document where highways and express lanes are discussed. Revise Description to include auxiliary lanes, general purpose lanes, carpool lanes, toll roads, toll lanes, and Express/HOT lanes.</p>	<p>Revised description of HOV/Express Lanes to note inclusion of toll roads. General purpose lanes and auxiliary lanes are included in other categories.</p>

ID	COMMENT	RESPONSE
0001792.18	<p>#18, Clarification, p. 30, 31 4.3 MultiModal System Preservation and Maintenance</p> <p>This section, second paragraph, outlines different factors that impact/damage roadways. One issue that has surfaced at SCAG policy committee meetings but which is not addressed herein, is the impact of EV vehicle weight on roadway pavement conditions. Please identify if this is a valid issue that merits discussion as a potential contributing factor to pavement distress during the 20+ year of the Plan.</p>	<p>The referenced section addresses the impacts of heavy vehicles on the region's roadways. This is inclusive of electric vehicles. In particular, EV trucks and buses are anticipated to have greater impacts on the regional roadway pavement conditions due to their increased weight.</p>
0001792.19	<p>#19, Clarification, p. 30-31, Section 4.3 Multimodal System O&M</p> <p>Descriptions in this section mainly focus on street preservation and only touch lightly on preservation of transit assets. The funding need for transit, however, is at least twice that of streets and roads. Suggest adding descriptions of existing transit needs (e.g. there are X number of buses and rail cars in our region that must be maintained in good working order as well as X miles of track infrastructure).</p>	<p>Comment noted. Transit O&M, including preservation, is discussed in Section 4.2. Further details on transit system preservation and asset management are included in the Mobility Technical Report.</p>
0001792.20	<p>#20, Clarification, p. 31, last paragraph</p> <p>"... maintain exiting transit" should be "existing".</p>	<p>This is an error and is corrected.</p>
0001792.21	<p>#21, p. 34-35, Clarification, Table 7 Revenues,</p> <p>There is a significant increase in revenues between the 2040-44 and 2045-49 periods, greater than any other time period. The increase seems exaggerated and requires further verification and clarification. Is the disproportionate forecast due to inflationary increase?</p>	<p>Comment noted. The last "bucket" (FY2045-FY2050) includes six years instead of five years because the plan period is 26 years. The extra year, in combination with presenting the totals in nominal dollars, accounts for the appearance of a relative increase in that column.</p>
0001792.22	<p>#22, Clarification, p. 7; Appendix 1, page 1 Local Option Sales Tax Measures,</p> <p>The overview of the local sales tax measures that are factored into the Local Core Revenue Sources, identifies that several county sales tax measures will expire during the forecast period of Connect SoCal 2024. Under the "Real Growth Rate" percentages by county in Appendix 1, would it be appropriate to further identify that this real growth rate is being applied up to the year of any applicable sales tax expiration? Also please note there is a duplicative sentence in the preceding paragraph, last sentence in Appendix 1.</p>	<p>Language added to Appendix 1 to clarify that the financial plan does not assume the continuation of local option sales taxes beyond current expiration dates. The duplicate sentence is deleted.</p>
Submitted by	Orange County Council of Governments	Submittal 0001793
0001793.01	<p>Table 17: Travel and Tourism</p> <p>#1, General Comment, All Pages</p> <p>Technical Report should consider highlighting/emphasizing opportunities for travel for bicycle/e-bicycle throughout (e.g. the need for bikeways, bicycle use to and from transportation stops/hubs and tourist destinations, the existing bicycle network).</p>	<p>Comment noted. Language has been added to sections 4.2 "Multimodal connections" and 5.22. "Visitor Accommodations, Climate Preparation, Mobility, Access and Research" to highlight and encourage bike and walking paths to transportation hubs and tourist destinations.</p>
0001793.02	<p>#2, General Comment, All Pages</p> <p>Add "2024" to all technical report page headers' titles</p>	<p>Technical report page headers' titles have been updated to include "2024".</p>
0001793.03	<p>#3, General Comments, All Pages</p> <p>In all tables, figures, charts, maps and narrative, cite original data sources and not SCAG or SCAG reports unless SCAG is the original data source. E.g., OK to say SCAG Connect SoCal 2024 Economic Model; but don't cite SCAG's Local Profiles if original data source is U.S. Census Bureau American Community Survey data</p>	<p>Sources have been updated to reference the original data source, where applicable.</p>

ID	COMMENT	RESPONSE
0001793.04	<p>#4, General Comment, All Pages</p> <p>Connect SoCal is often referred to as "the Plan". Capitalize "Plan" consistently throughout all documents.</p>	<p>Comment noted. Connect SoCal is not referred to as "The Plan" in the Travel and Tourism Technical Report.</p>
0001793.05	<p>#5, General Comment</p> <p>If definitions come from specific source or statute, include the reference in the narrative.</p>	<p>Comment noted. The travel and tourism CFR regulation is included in the narrative. Furthermore, due to the descriptions of the travel and tourist destinations coming from the websites for these tourist destinations, inclusion of the destination websites as sources in the narrative text would be redundant and would clutter the technical report. Furthermore, it is the practice in technical reports not to include weblinks as they can become outdated.</p>
0001793.06	<p>#6, General Comment, All Pages</p> <p>Note for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.</p>	<p>Comment noted. Data on existing and planned infrastructure capacity, such as water and sewer capacity, are not available at the local and neighborhood levels.</p>
0001793.07	<p>#7, Correction, p. 1, Section 1</p> <p>To address the CFR directive for the "continuous, cooperative., and comprehensive..."</p>	<p>Comment noted. Narrative text will be edited.</p>
0001793.08	<p>#8, General Comment, p. 1, Section 2</p> <p>Expand the description for Lake Arrowhead like on Page 7.</p>	<p>Comment noted. The description of Lake Arrowhead was edited on page 1 as to not be duplicative and redundant with the expanded description on page 7. The travel and tourist highlights on pages 1 and 2 are intended to be more high level to illustrate the variety of destinations and events in the region.</p>
0001793.09	<p>#9 Correction, p. 2, Section 2.2</p> <p>Contradicting sentences: "Moreover, due to the size of the region and variety of places to visit and things to do, much of the traveler spending is generated by people living within the region." (1st paragraph)</p> <p>"According to the Visit California 2021 Report, The Economic Impact of Travel, travel spending in the SCAG region totaled approximately \$46 billion, of which about \$41 billion was from people visiting from outside the region." (2nd paragraph)</p> <p>Reword to clarify statements.</p>	<p>Comment noted. The sentence is not a contradiction. However, I will add the following language to provide clarification. "A great amount of the traveler spending in the SCAG region comes from people within the region visiting different parts of the region (e.g., people from the beach cities in Los Angeles County visiting the desert in Riverside County and vice versa)."</p>
0001793.10	<p>#10 Correction, p. 3, Section 2.3</p> <p>"From 2019 to 2020, after the onset of the COVID-19 [strikethrough] Pandemic [strikethrough ends] pandemic, travel spending in the region went down by 50 percent."</p>	<p>Comment noted. Narrative text will be edited.</p>
0001793.11	<p>#11 Correction, p. 8, Section 3.1.2</p> <p>The title for the section includes Old Town Tustin but there is no example of Old Town Tustin in the list.</p>	<p>Comment noted. Narrative text will be edited to provide additional information.</p>

ID	COMMENT	RESPONSE
0001793.12	<p>#12 Correction, p. 10, Section 3.1.3</p> <p>[Strikethrough] Three [Strikethrough ends] Eight of the 23 Cal State University campuses are in the SCAG region, Cal State Los Angeles, Cal State Long Beach, Cal State Fullerton, Cal State Northridge, Cal State Dominguez Hills, Cal State Channel Islands, Cal State San Bernardino, and Cal Poly Pomona.</p> <p>Why aren't private universities included, such as Chapman, Pepperdine, University of La Verne, and Loyola Marymount?</p>	<p>Comment noted. Narrative text will be edited. Many universities and colleges in the region, including Chapman, Pepperdine, La Verne, and Loyola, were not included because the list of academic institutions is intended to be illustrative and not exhaustive.</p>
0001793.13	<p>#13, Correction, p. 10</p> <p>3.1.4 Theme Parks and Movie Studios should probably read Movie Studios</p>	<p>Comment noted. Narrative text will be edited.</p>
0001793.14	<p>#14, Correction, p. 12</p> <p>Bullet point #2: "National Football League" should be The Rose Bowl has hosted the National Football League (NFL) Super Bowl five times,...over the years."</p> <p>Bullet #3 "The Coliseum has served as the home for the [strikethrough] National Football League's [strikethrough ends] (NFL) NFL's Rams and Raiders and is the current [strikethrough] homefield [strikethrough ends] home field for the USC Trojans."</p> <p>Bullet point #4: "It is home of MLS Los Angeles FC and the National Women's Soccer League's (NWSL) Angel City FC."</p> <p>Bullet point #6: "Opened in 1993 and formerly known as The Pond, the Honda Center is an multi-purpose indoor arena located in Anaheim, CA."</p>	<p>Comment noted. Narrative text will be edited.</p>
0001793.15	<p>#15, Correction, p. 19</p> <p>"...there a various programs and projects..." should read "...there are various programs and projects..."</p>	<p>Comment noted. Narrative text will be edited.</p>
0001793.16	<p>#16, Correction, p. 23, Section 4.3,</p> <p>On the second paragraph it looks like there was supposed to be an image added, but it only shows (character?)</p>	<p>Comment noted. Graphic/character will be removed. The notification for endnote 4 generated the graphic/character as glitch or note.</p>
0001793.17	<p>#17, Correction , p. 24,</p> <p>3rd bullet point, should "For the 2024 Coachella Music Festival..." read "For the 2023 Coachella Music Festival..."?</p>	<p>Comment noted. Narrative text will be edited. That is correct, the bullet should read "2023 Coachella Music Festival" and not "2024 Coachella Music Festival".</p>
0001793.18	<p>#18, Correction p. 25; Bullet point #1; first sentence</p> <p>"The 2028 Summer Olympics...Metro and Caltrans, has developed an LA 28 Games transportation plan.,"</p>	<p>Comment noted. Narrative text will be edited.</p>
0001793.19	<p>#19, General Comment, p. 26, Section 5.1</p> <p>The fourth sentence is almost a repeat of the first sentence. Please delete or reword.</p>	<p>Comment. Narrative text will be edited. Sentences one and four of section 5.1 edited to reduce redundancy.</p>

ID	COMMENT	RESPONSE
0001793.20	#20 Correction, p. 27 Change "city and county boarders" to "city and county borders"	Comment noted. Narrative text will be edited.
0001793.21	#21, Correction, p. 29 Last paragraph, correct to read as "California Coastal Commission"	Comment noted. Narrative text will be edited.
Submitted by	Orange County Transportation Authority	Submittal 0001668
0001668.01	For ORA030605, please modify the RTP project list and model to reflect the project as being open to traffic in 2023. Note, the FTIP completion date for this project shows 2026, as the FTIP listing indicates the full project closeout date, rather than the open to traffic date of 2023.	Comment noted. The completion year will be updated as requested in the Final Connect SoCal 2024 RTP/SCS Project List Technical Report. FTIP project #ORA030605 is now open to traffic and so the update is obligatory and must be captured in the final regional transportation modeling. SCAG references the completion year or the open to traffic year for conducting regional transportation modeling, while for programming purposes in the FTIP, a separate full project closeout date may be noted. The full project closeout date will remain 2026 in the FTIP, while the open to traffic date will be revised to 2023 in both the FTIP and RTP.
Submitted by	Orange County Transportation Authority	Submittal 0001733
0001733.01.1	The Orange County Transportation Authority (OCTA) appreciates the opportunity to comment on the draft Connect SoCal 2024. Please refer to the attachment for the signed comment letter and detailed comments for the technical reports.	Comment noted.
0001733.01.2	Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) draft Connect SoCal 2024, the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The draft RTP/SCS reflects the transportation and funding challenges that the region will face in the coming years. These documents are critical to the region's ability to improve mobility, and to operate and maintain the transportation system.	Comment noted.
0001733.01.3	The Orange County Transportation Authority (OCTA) appreciates that SCAG has included the commitments identified in OCTA's 2022 Long-Range Transportation Plan (LRTP) and utilized demographic forecasts approved and submitted by the Orange County Council of Governments. Additionally, OCTA recognizes the hard work and cooperation of SCAG staff throughout the RTP/SCS and Program Environmental Impact Report (PEIR) development process.	Comment noted.
0001733.01.4	In reviewing the draft Plan, OCTA has identified several policy and technical matters to bring to SCAG's attention. These primarily focus on the core and new reasonably available revenue projections, regional planning policies, regional express lanes, passenger rail assumptions, and investments proposed by SCAG that go beyond the LRTP.	Comment noted.
Submitted by	Orange County Transportation Authority	Submittal 0001760

ID	COMMENT	RESPONSE
0001760.01	<p>Core and New Reasonably Available Revenue Projections</p> <p>The draft RTP/SCS shows a \$750.1 billion revenue projection, 47 percent of which is from local sources. This projection includes revenues from both historic, or “core,” revenues and new “reasonably available” revenue sources. The RTP/SCS recognizes the region relies heavily on local sales taxes that make up 58 percent of local core revenue sources. The projections assumed that revenues from local sales tax measures will grow consistent with county transportation commission (CTC) forecasts and historical trends.</p> <p>The draft RTP/SCS also acknowledges that local sales tax measures for three counties will expire during the term of the RTP/SCS, including Orange County’s Measure M2 in 2041. However, Table 4.2 shows that the core revenue forecast for Orange County continues to increase following the expiration of Measure M2, with a significant increase in the FY2045-2050 period (\$25.1 billion in FY2045-2050 compared to \$18.3 billion in FY 2040-2044 and \$17.6 billion in FY2035-2039).</p> <p>Please review and clarify the reason for the increased core revenues for the periods that look beyond the expiration of local sales tax measures (i.e. inflationary adjustments or additional funding sources). SCAG should also further emphasize that extensions of expiring sales tax measures are not assumed in the revenue forecast.</p>	<p>Comment noted. The last column (FY2045-FY2050) includes six years instead of five years because the Plan period is 26 years. The extra year, in combination with presenting the totals in nominal dollars, accounts for the appearance of a relative increase in that column. The Plan includes the assumption that Measure M2 ends in 2041.</p>
0001760.02	<p>With respect to the new reasonably available revenues that are assumed in the draft Plan, OCTA recommends that SCAG staff provide regular updates to the SCAG Transportation Committee and Regional Council regarding the key implementation factors, including but not limited to:</p> <ul style="list-style-type: none"> -Technology and associated privacy issues, -Cost of implementation and administrative methods for fee collection/revenue allocation, -Equity concerns and exemptions/credits, as applicable, -Rate structures and associated impacts including evaluation of flat rates, differential pricing by type of vehicle including size and weight, time-of-day, and potentially emissions (including greenhouse gas emissions), and -Economic assessment. 	<p>Comment noted. SCAG regularly provides updates on the topics related to the financial plan, transportation funding, and revenues for transportation investments to SCAG Transportation Committee and Regional Council and will continue to do so.</p>
0001760.03	<p>Further, OCTA recommends that SCAG staff also work with the county transportation commission and other stakeholders to evaluate the impacts of the new transportation user fees on existing local transportation funding mechanisms including local sales tax measures, express lanes, and toll facilities to consider how best to integrate the various transportation funding mechanisms. Additionally, any new user fees should include return-to-source criteria to ensure equitable distribution of funds.</p>	<p>Comment noted. SCAG staff will continue to work with county transportation commissions and other stakeholders to evaluate the impacts of the new transportation user fees. SCAG’s key guiding principles for financial strategies includes establishing a user-based system that provides firewall protection for new and existing transportation funds, and ensures an equitable distribution of costs and benefits. SCAG continues to promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources.</p>
0001760.04	<p>Regional Planning Policies</p> <p>The introduction of new regional planning policies states that they can provide guidance for the county transportation commission and local jurisdictions to integrate land use and transportation planning to align with the RTP/SCS vision. While the list is comprehensive, some policies lack coherence with one another for a clear direction in regional planning. As a county transportation commission and self-help county member, OCTA recommends the following changes to improve the effectiveness of these policies:</p> <p>The role and contribution of self-help counties in advancing regional transportation goals and objectives should be more explicitly recognized and supported by the policies. SCAG should consider including a policy that encourages coordination and collaboration by SCAG and the county transportation commission on project prioritization and delivery.</p>	<p>Comment noted. The Implementation Strategies included in Connect SoCal 2024 provide a broad range of opportunities for coordination and collaboration by SCAG and the county transportation commissions (and others) to address project prioritization and delivery.</p>

ID	COMMENT	RESPONSE
0001760.05	<p>SCAG should acknowledge how the policies may have different effects within varying land use contexts. The policies should allow more flexibility for subregions and local communities to tailor their strategies and actions according to their specific needs and contexts. For example, consider including a policy that acknowledges the diversity of land-use patterns and transportation modes across the region and supports context-sensitive solutions.</p>	<p>Comment noted. The Regional Planning Policies provide guidance for integrating land use and transportation planning to realize the vision of Connect SoCal. The Regional Planning Policies are a resource for County Transportation Commissions (CTCs) and local jurisdictions, who can refer to specific policies to demonstrate alignment with the Regional Transportation Plan/Sustainable Communities Strategy when seeking resources from state or federal programs. These policies are inherently flexible that way they are applicable to various parts of our diverse region.</p>
0001760.06	<p>SCAG should provide additional guidance on how to address potentially competing policy priorities. Many of these policies include the action word "prioritize," implying these modes or projects are more important than others, which may not be appropriate or feasible in all contexts. For example, Policy #1 states that SCAG will prioritize repair, maintenance and preservation of the SCAG region's existing transportation assets following a "Fix-it-First" principle. However, this policy may conflict with other policies that prioritize new investments or expansions of the transportation system, such as Policy #6 that supports implementation of complete streets improvements in Priority Equity Communities or Policy #13 that prioritizes transportation investments that increase travel time reliability.</p>	<p>Comment noted. The text in Chapter 3, "Regional Planning Policies" has been amended to clarify the applicability of these policies and their intent as guidance and not a comprehensive and concurrent path for all jurisdictions and agencies.</p>
0001760.07	<p>Regional Express Lane Network The proposed regional express lane network assumes future operation of express lanes on the following segments in Orange County: [See table in attached letter]</p> <p>The proposed regional express lane network also identifies express lane connectors between SR-241 and SR-91 in Orange County.</p> <p>The draft RTC/SCS should reflect the recent opening of the I-405 express lanes in December 2023 and the proposed I-5 express lanes project is being led by Caltrans, District 12. It should also be noted that the conversion from high-occupancy vehicle to tolled express lanes for SR-57 north of I-5 and SR-91 west of SR-55 would require approval by the OCTA Board of Directors prior to pursuing implementation. Furthermore, please clarify that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community input, and overall feasibility.</p>	<p>Comment noted. The plan is updated to reflect the opening of the I-405 express lanes in Orange County.</p> <p>We acknowledge that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community input, and overall feasibility. Plan amendments provide opportunities to revise assumptions and project details as deemed necessary.</p>
0001760.08	<p>Passenger Rail Assumptions The draft RTP/SCS assumes the Metrolink Southern California Optimized Rail Expansion (SCORE) Program capital components are completed by 2035 at a cost of \$10.5 billion year of expenditure dollars (YOES). The SCORE Program would accommodate a significant increase in Metrolink service with up to 15-minute peak-period service on much of the Metrolink system. The draft RTP/SCS also assumes SCORE Program operating costs between 2035 and 2050 of \$4.8 billion YOES, funded by new reasonably available revenues. OCTA recommends SCAG staff assist Metrolink and the county transportation commission in detailing implementation steps for the SCORE Program including securing new revenue sources to support operations at the levels assumed in the draft RTP/SCS.</p>	<p>Comment noted. SCAG will continue to coordinate with Metrolink on SCORE updates and implementation and with the County Transportation Commissions as appropriate.</p>
0001760.09	<p>The draft RTP/SCS further includes phase one of the California High-Speed Rail (CAHSR) Project at a regional cost of \$33 billion YOES. Phase one includes a 500-mile system between the Cities of Anaheim and San Francisco, with the initial operating segment in California's Central Valley anticipated to start revenue service in 2033.</p> <p>OCTA recommends that SCAG staff provide regular updates to the SCAG Transportation Committee and Regional Council regarding both the CAHSR Project and the Metrolink SCORE Program. This is particularly necessary for activities related to the Los Angeles to Anaheim Project Section Supplemental Alternative Analysis (SAA) recently released by the California High Speed Rail Authority (CHSRA).</p>	<p>Comment noted. SCAG staff have invited the California High Speed Rail Authority to share updates with the Transportation Committee. SCAG staff can also extend the invitation to Metrolink to present updates on its SCORE Program or to share them via the Transportation Committee's recurring Metrolink update item.</p>

ID	COMMENT	RESPONSE
0001760.10	<p>Through the SAA, CHSRA recommends advancing the Shared Passenger Track Alternative, and eliminating other potentially viable alternatives, prior to preparing a Draft Environment Impact Report. The SAA lacks sufficient detail regarding modeling assumptions, operating speeds, station relocation, track reconfiguration, impacts to existing shared track agreements and the SCORE program implementation, amongst other potential impacts that may result from the implementation of the Shared Passenger Track Alternative. Therefore, OCTA recommends that SCAG facilitate coordination between the county transportation commission county transportation commission, CHSRA, and Metrolink to ensure integrated capital and operating planning for the CAHSR Project and the Metrolink SCORE Program.</p>	<p>Comment noted. SCAG will continue to coordinate with Metrolink, County Transportation Commissions, and the California High Speed Rail Authority on capital and operating planning efforts, including scheduling periodic check-ins.</p>
0001760.11	<p>Other Investments Beyond the 2022 LRTP</p> <p>The draft RTP/SCS proposes several other investments that are assumed to be funded by new reasonably available revenues that go beyond the LRTP assumptions. Examples include:</p> <ul style="list-style-type: none"> - \$28 billion for system preservation and resilience on highway, local streets and roads - \$24 billion for additional O&M and preservation on transit system - \$19 billion for safe and active street improvements including complete streets - \$5 billion for supplemental transportation demand management strategies - \$5 billion for additional transportation system management and intelligent transportation system improvements - \$3 billion in a mobility equity fund - \$3 billion for housing-supportive infrastructure - \$2 billion for pooled incentives. - \$1 billion for additional transit priority and enhancement - \$1 billion for a plug-in electric vehicle rebate program, and - \$1 billion in regional advance mitigation <p>OCTA recognizes that it is within SCAG's purview to plan for regional strategic investments to reach performance targets and goals set by the RTP/SCS; however, it should be noted that OCTA is committed to delivering the projects within the LRTP. The draft RTP/SCS should clearly state that implementation of the regional strategic investments is subject to availability of new revenue sources and must undergo the necessary project development and review processes by the implementing agencies. OCTA will only consider investments beyond the LRTP project list after new revenues are realized and identified to account for these additional improvements.</p>	<p>Comment noted. We acknowledge that Regional Strategic Investments included in Connect SoCal are subject to necessary project development and review processes by the implementing agencies. Plan amendments provide opportunities to revise assumptions and project details as deemed necessary.</p>
Submitted by	Orange County Transportation Authority	Submittal 0001767
0001767.01	<p>ES/21 - SMM-AG-3</p> <p>Greenprint is called out here. Need to review language.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter TRANS-1 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001767.02	<p>Pg. 40 Map 2.2</p> <p>No existing Rapid Bus/Bus Rapid Transit on SR 55 and SR 91. Please remove green line on map.</p>	<p>This update is applied.</p>
0001767.03	<p>p. 95</p> <p>405 Express Lanes should be changed from 'under construction' to 'existing'.</p>	<p>The Plan is updated to reflect the opening of the I-405 express lane facility in Orange County in December 2023.</p>
0001767.04	<p>Section 2; General</p> <p>Provide more context or reference the corresponding technical report when introducing a figure/map. Many maps are included without any references to them in the texts.</p>	<p>Text has been added to refer directly to maps included in Chapter 2 of Connect SoCal 2024.</p>

ID	COMMENT	RESPONSE
0001767.05	Pg. 40 Map 2.2 Define "Rapid Bus/BRT"	Comment noted. Bus Rapid Transit (BRT) is defined in the Main Book's Glossary. In addition, BRT is defined on p.38 of the Mobility Technical Report as "fixed-route bus services where at least 50 percent of the service is operated on a fixed guideway. These systems also typically have dedicated passenger stations with ticket vending machines, elevated platforms and enhanced stations, off-board fare collection busways, dedicated bus lanes, traffic signal priority or preemption, short headways (i.e., the amount of time between transit vehicle arrivals at a stop), and separate branding of the high-quality service. This is a lower-cost alternative to light rail."
0001767.06	Pg. 42 Map 2.4 Fix legend for freeway/highway.	The freeway symbol in the legend on Map 2.4 is corrected.
0001767.07	Pg. 49 Is the figure on the right suggesting the there is a backlog of unmet needs of 250,000 housing units within the region (3 white houses x 83,333 units left after backfilling with green houses from 2000 - 2020)? Recommend clarifying in the report text.	The graphic is updated.
0001767.08	Pg. 65 "SCAG has gained new responsibility for the selection of transportation projects to be funded with federal revenue sources" - please specify the specific federal funding sources this statement is referring to and its implementation status.	As of July 1, 2023, SCAG is responsible for the selection of projects to be funded with Surface Transportation Block Grant (STBG), Congestion Mitigation and Air Quality Improvement Program (CMAQ), and Carbon Reduction Program (CRP) dollars.
0001767.09	Pg. 81 Table 3.1 Table 3.1 shows some notable differences on demographics projections when compared to Orange County Projects (OCP)-2022 projections. In particular, OCP-2022 projects a declining population within OC between 2035 and 2050, while Table 3.1 shows a 4% increase. While the Demographic & Growth Forecast Technical Report explains in more detail the need to regionally balance the projections of population, households, and jobs, it would be helpful to include a high-level explanation/clarification within the main RTP/SCS document for significant discrepancies between SCAG and county projections.	<p>SCAG collaborated with the Center for Demographic Research (CDR) to ensure alignment with OCP-2022 on the locally-reviewed forecast elements. This included total households and total employment in 2019, 2035, and 2050—unlike in past cycles, in order to streamline the review process for jurisdictions region-wide, we did not request local review of population data unless there were notable differences in factors such as household sizes or group quarters accommodations.</p> <p>The differences in the population projection from Orange County stems principally from a regionally-oriented versus a county-oriented assumption about future workers. While the future employment and housing/household totals are identical, SCAG anticipates that a higher share of the county's future on-site workers live in Orange County rather than commuting from other counties, resulting in a higher population and higher household sizes.</p> <p>A note describing the source of possible differences from other county forecasts has been added to the main book.</p>
0001767.10	Pg. 94 Map 3.1 OC Streetcar should be shown.	SCAG confirms the Planned Transit Network reflects the OC streetcar.
0001767.11	Pg. 95 Map 3.2 The conversion from high-occupancy vehicle to tolled express lanes for SR-57 north of I-5 and SR-91 west of SR-55 would require approval by the OCTA Board of Directors prior to pursuing implementation. Furthermore, the draft RTP/SCS should clarify that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.	Comment noted. We acknowledge that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community input, and overall feasibility. Plan amendments provide opportunities to revise assumptions and project details as deemed necessary.
0001767.12	Pg. 95 Map 3.2 Dual Express Lane facility on I-405 in Orange County began operation in December 2023.	The Plan is updated to reflect the opening of the I-405 express lane facility in Orange County in December 2023.

ID	COMMENT	RESPONSE
0001767.13	<p>Pg. 95 Map 3.2</p> <p>Update to show the following facilities are open as of 12/1/2023:</p> <ul style="list-style-type: none"> - 405 HOT - 73 GP connector - 405 HOT - 22 HOV connector - 405 HOT - 605 HOV connector - Express dual lanes on I-405 between SR-73 and I-605 	<p>Comment noted. Map change: The following facilities are reclassified as "existing" rather than "planned" or "under construction" on Map 3.2 in the "Our Plan" section:</p> <ul style="list-style-type: none"> • 405 HOT - 73 GP connector • 405 HOT - 22 HOV connector • 405 HOT - 605 HOV connector • Express dual lanes on I-405 between SR-73 and I-605
0001767.14	<p>Pg. 114</p> <p># 10, specify the type of transportation project (similar to #6), otherwise the policy would be misunderstood without the subheading.</p>	<p>Comment noted. The types of transportation projects are not specified in regional planning policy #10 as the projects are multimodal and to-be-determined based on community needs.</p>
0001767.15	<p>Pg. 115</p> <p>#12, remove the phrase "instead of adding roadway capacity" as the phrase is not necessary to define this policy and efficient use of existing system should not be mutually exclusive with adding capacity.</p>	<p>Comment noted. SCAG recognizes that efficient use of the existing system and adding capacity are not necessarily mutually exclusive. The language, "instead of adding roadway capacity" was intentionally added to improve alignment with federal congestion management process requirements.</p>
0001767.16	<p>Pg. 141</p> <p>"... accompany user fee policies and assume mitigation measures, such as the establishment of a mobility equity fund." - recommend providing example usages for mobility equity fund. It is defined later on page 157 but not when it's first mentioned.</p>	<p>Language is changed to "SCAG further considers the potential equity concerns that accompany user fee policies and assumes mitigation measures, such as the establishment of a mobility equity fund, to provide resources that can increase access for priority equity communities, particularly transportation equity zones (TEZs)."</p>
0001767.17	<p>Pg. 153 Table 4.2</p> <p>Figure 4.9 shows that local sales taxes account for 58% of local core revenue, the largest single source of all sources. Page 149 acknowledged that local sales taxes for three counties will expire during the term of the Plan, including Orange County's Measure M in 2041. However, the core revenue forecast shown in Table 4.2 show a significant increase in funding in OC for the period of FY2045-2050 (\$25.1 billion in FY2045-2050 compared to \$18.3 billion in FY 2040-2044 and \$17.6 billion in FY2035-2039. Recommend providing clarification on the revenue increase beyond the expiration of local sales tax measures (i.e. inflationary adjustments or additional funding sources). SCAG should also further emphasize that extensions of expiring sales tax measures are not assumed in the revenue forecast.</p>	<p>The last "bucket" (FY2045-FY2050) includes six years instead of five years because the Plan period is 26 years. The extra year, in combination with presenting the totals in nominal dollars, accounts for the appearance of a relative increase in that column. The Plan includes the assumption that Measure M2 ends in 2041. Language added to Appendix 1 to clarify that the financial plan does not assume the continuation of local option sales taxes beyond current expiration dates.</p>
0001767.18	<p>Pg. 171 Table 4.5.2</p> <p>Note the following "*" indicates the "Active Transportation" item includes \$8.8 billion in addition to \$29.2 billion of capital project investment for a total of \$38 billion. Which line item is \$8.8 billion contained under?</p>	<p>This is an error and is corrected by updating the asterisk to indicate that addition active transportation funding is contained in the line item for operations and maintenance of regional significant local streets and roads.</p>
0001767.19	<p>Page 14, Section 4.1.2, paragraph 1</p> <p>Please update language in red [shown in brackets] - "Orange County Transportation Authority (OCTA) uses four performance indicators which include vehicle headway, to measure how often service is available to transit patrons; [Vehicle load], measuring how many standees there are on a transit vehicle; on-time performance (OTP); and service accessibility, which measures the percentage of the population that has access to their service."</p>	<p>SCAG is revising text to read: "Orange County Transportation Authority (OCTA) uses four performance indicators which include vehicle headway, to measure how often service is available to transit patrons; vehicle load, measuring how many standees there are on a transit vehicle; on-time performance (OTP); and service accessibility, which measures the percentage of the population that has access to their service."</p> <p>For reference, the prior text reads: "Orange County Transportation Authority (OCTA) uses four performance indicators which include vehicle headway, to measure how often service is available to transit patrons; load factor, measuring how many standees there are on a transit vehicle; on-time performance (OTP); and service accessibility, which measures the percentage of the population that has access to their service."</p>

ID	COMMENT	RESPONSE
0001767.20	<p>Page 25, Section 5.2.2, Paragraph 2</p> <p>Please Update language in red [shown in brackets] - "OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 20[23]. Orange County's latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over the[ir] 1991 baseline. Between 1991 and 20[23], the average AM peak period ICU improved from 0.67 to [0.55], a [17.9] percent improvement, and the average PM peak period ICU improved from 0.72 to [0.58], a [19.4] percent improvement."</p>	<p>SCAG is revising text to read: "OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 2023. Orange County's latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over the 1991 baseline. Between 1991 and 2023, the average AM peak period ICU improved from 0.67 to 0.55, a 17.9 percent improvement, and the average PM peak period ICU improved from 0.72 to 0.58, a 19.4 percent improvement."</p> <p>For reference, the prior text reads: "OCTA is the latest CTC to have completed a state Congestion Management Program network analysis in 2021. Orange County's latest performance, using an average intersection capacity utilization (ICU) analysis rating, shows an improvement over their 1991 baseline. Between 1991 and 2021, the average AM peak period ICU improved from 0.67 to 0.43, a 36 percent improvement, and the average PM peak period ICU improved from 0.72 to 0.52, a 28 percent improvement."</p>
0001767.21	<p>Page 25, Section 5.2.2, Paragraph 3</p> <p>"Like OCTA, RCTC's minimum LOS standard is E." - This sentence implies that OCTA created the minum standard of LOS E, the standard is set by California State legislation. Please refer to California Government Code Section 65089(b) which outlines CMP elements/requirements. The full text of the Government Code can be viewed at https://leginfo.legislature.ca.gov/faces/codes.xhtml, sections 65088-65089.10.</p>	<p>SCAG is revising the text to delete the reference to OCTA so that the text reads: "RCTC completed its last state program analysis in December of 2011. RCTC's minimum LOS standard is E. Its 2011 analysis indicated that four freeway segments (three on I-15 and one on I-215) and three arterial segments were operating at LOS F levels. All seven of these locations however had programmed projects in RCTC's Capital Improvement Program (CIP where were expected to improve the LOS to E or better."</p>
0001767.22	<p>Page 37, Paragraph 1</p> <p>Please update language in red [shown in brackets] - "A specific example of a roadway ITS project is Orange County's Measure M2 Regional Traffic Signal Synchronization Program (RTSSP), also known as Project P, which provides funding and assistance to implement multi-agency signal synchronization. The target of the program is to regularly coordinate 2,000 signals along 750 miles of roadway as the basis for synchronized operation across Orange County. To date, OCTA and local agencies have synchronized more than [3,500] intersections along more than [903] miles of streets ([101] completed projects). The OCTA Board of Directors, through a competitive process, have approved [13] rounds of M2 funding for Project P. On [April 10, 2023], the Board awarded approximately [\$3.66] million dollars to three projects as part of the 2023 Call for Projects Regional Traffic Signal Synchronization Program (RTSSP). To date, OCTA has funded more than \$162 million (including [\$30.5] million in external funding) to [131] projects.</p>	<p>Comment noted. Text has been revised to state: A specific example of a roadway ITS project is Orange County's Measure M2 Regional Traffic Signal Synchronization Program (RTSSP), also known as Project P, which provides funding and assistance to implement multi-agency signal synchronization. The target of the program is to regularly coordinate 2,000 signals along 750 miles of roadway as the basis for synchronized operation across Orange County. To date, OCTA and local agencies have synchronized more than 3,500 intersections along more than 903 miles of streets (101 completed projects). The OCTA Board of Directors, through a competitive process, have approved 13 rounds of M2 funding for Project P. On April 10, 2023, the Board awarded approximately \$3.66 million dollars to three projects as part of the 2023 Call for Projects Regional Traffic Signal Synchronization Program (RTSSP). To date, OCTA has funded more than \$162 million (including \$30.5 million in external funding) to 131 projects.</p>
Submitted by	Orange County Transportation Authority	Submittal 0001768
0001768.01	<p>10 / Table 1-5</p> <p>Can any conclusions be drawn from these numbers regarding what the charger deficit will be by a certain time? What about electricity infrastructure?</p>	<p>The following language has been added to Page 10 of the Mobility Technical Report. "According to the CEC AB 2127 report, to achieve the targets set by Executive Order N-79-20, California requires nearly 2 million public and shared-private charging facilities by 2035 to support light-duty vehicles. Within the SCAG region, this translates to a need for 1 million charging points by 2035. Of these, 689,000 are expected to be publicly accessible stations, with the rest catering to workplaces and multi-unit dwellings. Currently, the SCAG region has about 33,000 Level 2 and 3,700 DC Fast Charging (DCFC) chargers. When the current number of chargers deployed in the region are compared with the future projections outlined in the AB 2127 report, it is evident that the existing infrastructure falls significantly short of the projected demand. To address the infrastructure deficit, there is a significant need for an increased pace of charger installation from between 2024 and 2035. Specifically, each week during this period, around 1,500 chargers for light-duty vehicles should be constructed and commissioned in the SCAG region."</p>

ID	COMMENT	RESPONSE
0001768.02	44 & 82 Change OC Streetcar opening from 2024 to 2025	<p>SCAG is revising text on p. 44 of the Mobility Technical Report to read: "Metro and SCRRA operate light rail service in the region, and OCTA plans to open a streetcar in 2025."</p> <p>For reference, the prior text reads: "Metro and SCRRA operate light rail service in the region, and OCTA plans to open a streetcar in 2024."</p> <p>SCAG is revising text on p. 82 of the Mobility Technical Report to read: "OCTA is constructing the first modern streetcar in the region which will open in 2025 and provide service between Santa Ana and Garden Grove, connecting with Amtrak and Metrolink in Santa Ana."</p> <p>For reference, the prior text reads: "OCTA is constructing the first modern streetcar in the region which will open in 2024 and provide service between Santa Ana and Garden Grove, connecting with Amtrak and Metrolink in Santa Ana."</p>
0001768.03	49 Remove existing Rapid Bus/BRT from SR 55 and 91 on regional map	This update is applied.
0001768.04	99 2nd bullet under "Policy and Planning", provide example of what kind of support SCAG will provide.	SCAG is adding text to describe its role serving on CalSTA's Transit Transformation Taskforce, which will result in a comprehensive report with recommendations to grow transit ridership, improve the transit experience, and address long-term operational needs. SCAG anticipates advocating for policies - including legislation- that will support the region's priorities.
0001768.05	106 Table 2-4 Safety Events should be defined somewhere.	SCAG is adding text in the preceding paragraph to read: "The thresholds for "reportable" fatalities, injuries, and safety events are defined in the National Transit Database Safety and Security Reporting Manual."
0001768.06	115 Why aren't Class III e-bikes considered a bicycle under definitions? Based on current regulations, the only place Class III e-bikes are prohibited are unpaved wilderness trails.	Comment noted. The definition of a bicyclist is taken directly from the State Bicycle and Pedestrian plan to align Connect SoCal with the State's plan.
0001768.07	118 Under "Bicycle Sales" consider changing "leisure" to "recreation"	The term "leisure" is updated to "recreation" for "Bicycle Sales" under section 3.3 of the Mobility Technical Report.
0001768.08	118 Under "Transportation Safety Issues" it reads like there is going to be a list after "A variety of factors are thought to have contributed..." but only changing commut patters is listed outside of the parentheses. Consider changing parentheses.	The parentheses is moved to better reflect the intent of the sentence. The sentence is updated from "A variety of factors are thought to have contributed to this rise, including changing commute patterns (e.g., traffic being spread more evenly throughout the day and increases in risky driver behaviors such as speeding, failure to wear seatbelts, driving under the influence)." to "A variety of factors are thought to have contributed to this rise, including changing commute patterns (e.g., traffic being spread more evenly throughout the day) and increases in risky driver behaviors such as speeding, failure to wear seatbelts, and driving under the influence."

ID	COMMENT	RESPONSE
0001768.09	<p>118</p> <p>There is mention in the main plan document of the importance of the land use/transportation nexus. It would be useful to discuss how reappropriating space on streets for active transportation supported land uses was used during the pandemic and what lessons can be learned.</p>	<p>Comment noted. Section 3.3 of the Mobility Technical Report includes a discussion on how the COVID-19 pandemic prompted communities to consider how public space is allocated and several communities prioritized opening up streets to bicyclists and pedestrians to make it easier to physically distance from others while traveling to essential businesses and work and engaging in recreation. In addition, many people stayed closer to home and bicycling and walking were regarded as reliable and resilient options because they enabled physical distancing and carried a low risk of contracting or spreading COVID-19. While the focus of the pandemic in this section is on travel patterns, this section also notes that the long term sustainability of these changes (which may affect land use patterns) will depend on various factors, including post-pandemic travel patterns, ongoing infrastructure investments, and individuals' preferences and behaviors.</p> <p>SCAG currently has several pilot programs and grant opportunities to improve accessibility for people biking and walking, such as facilitating the regional component of the State's Active Transportation Program (ATP) grant program and associated Sustainable Communities Program Active Transportation & Safety call for projects. SCAG recently received a federal Safe Streets and Roads for All grant, which will allow it to fund more quick build projects across the region that will test innovative treatments that reappropriate space on streets for active transportation.</p>
0001768.10	<p>122</p> <p>Recommend switching the headers in Table 3-1. It would be easier to view "Existing" and "Planned" side by side.</p>	<p>The table is updated to switch the rows "Existing" and "Planned" to columns.</p>
0001768.11	<p>125</p> <p>Figure 3-7 is a bit unclear. Does this mean that the 2013-2017 bar show the change over that time, or the amount during that time? Please clarify.</p>	<p>The source caption for Figure 3-7 and other figures that use the same data source is updated to clarify the sources are the 2013 - 2017 five-year estimates and 2017 - 2021 five-year estimates from the American Community Survey. In addition, the title of Figure 3-7 has been updated to "Active Transportation Commute Mode Share by County for 2017 and 2021"</p>
0001768.12	<p>196</p> <p>Section 4.3.1 where it says "In some areas, VMT surpassed pre-pandemic levels", recommend providing discussion on if there's a pattern to the type of area/location that sees the most increase in VMT. Figure 4-1 on the next page illustrates the month where VMT surpassed pre-pandemic level, but doesn't really support the text.</p>	<p>Comment noted. SCAG is updating the text from: "In some areas, VMT surpassed pre-pandemic levels..." to "Over this period, VMT slowly approached pre-pandemic levels and appears to have briefly eclipsed pre-pandemic levels around the end of 2021, before falling again below pre-pandemic levels and remaining there through April 2022 (the most recent data)." SCAG is also adding a data citation of Streetlight to the figure. For more information on VMT trends, please see SCAG's quarterly transportation trends reports to its Transportation Committee.</p>
0001768.13	<p>196</p> <p>1st paragraph under 4.3.1, last sentence, "as shown if figure 4-1" should say "in".</p>	<p>The last sentence in the first paragraph under section 4.3.1 in the Mobility Technical Report is changed to read "Figure 4-1 illustrates the changes in VMT for regional VMT between January 2020 and April 2022."</p>
0001768.14	<p>199</p> <p>Under "Managed Lanes", "the current occupancy status of their vehicles using before..", the word "using" should be removed.</p>	<p>The fourth sentence in the second paragraph under the "Managed Lanes" section in the Mobility Technical Report is changed to read "In other cases—as with several express lanes in the SCAG region—drivers can use switchable FasTrak transponders to self-declare the current occupancy status of their vehicles before entering a tolled lane facility."</p>
0001768.15	<p>200</p> <p>It's stated that for the purpose of Caltrans degradation analysis and reporting, HOV and HOT lanes are combined into a single total. Future reporting should separate HOV and HOT operations since mitigation strategies to address degradation differ for each type of facility.</p>	<p>Comment noted. To the extent that Caltrans provides reporting of degradation status by HOV and HOT, this can be addressed in future Plan updates. Please see https://dot.ca.gov/programs/traffic-operations/hov/hov-degradation-report for Caltrans' Degradation Reports.</p>
0001768.16	<p>202</p> <p>Dual Express Lane facility on I-405 in Orange County began operation in December 2023.</p>	<p>The Plan is updated to reflect the opening of the I-405 express lane facility in Orange County in December 2023.</p>

ID	COMMENT	RESPONSE
0001768.17	<p>203 Map 4-2</p> <p>It should be noted that the conversion from high-occupancy vehicle to tolled express lanes for SR-57 north of I-5 and SR-91 west of SR-55 would require approval by the OCTA Board of Directors prior to pursuing implementation. Furthermore, the draft RTP/SCS should clarify that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility.</p>	<p>Comment noted. We acknowledge that the proposed regional express lane network is subject to further study to evaluate right-of-way impacts, community input, and overall feasibility. Plan amendments provide opportunities to revise assumptions and project details as deemed necessary.</p>
0001768.18	<p>203 Map 4-2</p> <p>Update to show the following facilities are open as of 12/1/2023:</p> <ul style="list-style-type: none"> - 405 HOT - 73 GP connector - 405 HOT - 22 HOV connector - 405 HOT - 605 HOV connector - Express dual lanes on I-405 between SR-73 and I-605 	<p>The Plan is updated to reflect the opening of the I-405 express lane facility in Orange County in December 2023.</p>
0001768.19	<p>210 Figure 4-3 & Figure 4-4</p> <p>What is the targeted level for pavement conditions for the state highways and bridges? And how has ratios of good/fair/poor conditions shifted compared to the past RTP/SCS? How will implementation of the Plan result in pavement conditions improvements?</p>	<p>Comment noted.</p> <p>In response to your first question: Please see Table 19 in the Performance Monitoring Technical Report: "Since the Interstate System in California is operated and maintained by Caltrans, the targets shown for the SCAG region are reflective of the statewide targets. For non-interstate NHS roadways, a significant improvement of 6.6 percent is targeted for the share of SCAG region pavements in good condition between 2019 and 2025, increasing from 2.7 percent to 9.3 percent. In addition, the share of non-interstate NHS pavements in the SCAG region that are in poor condition are expected to decrease by 2.3 percent, from 20.6 percent in 2019 to 18.3 percent by 2025. For NHS bridges in the SCAG region, the share of structures in good condition are expected to decrease by four percent, from 38.6 percent in 2019 to 34.6 percent in 2025. However, the share of regional NHS bridges in poor condition will also decrease, from 12.2 percent in 2019 to 12.0 percent by 2025."</p> <p>In response to your second question: In 2017 (the baseline year used for this performance measure in the prior 2020 RTP/SCS), pavement conditions on the state highway system in the SCAG region were estimated to be about 49% in fair condition, 49% in good condition, and 2% in poor condition. This is compared to about 50% in fair condition, 48% in good condition, and 2% in poor condition in 2019 (the baseline year used for this performance measure in the 2024 RTP/SCS). In 2017, pavement conditions on national highway system (NHS) bridges in the SCAG region were 36.1% good, 14.8% poor, and 49.1% fair; by 2019, pavement conditions on NHS bridges had shifted to 38.6% good, 12.2% poor, and 49.2% fair.</p> <p>In response to your third question: Connect SoCal 2024 is committed to maintaining a sustainable regional multimodal transportation system by allocating approximately \$384 billion toward maintaining and operating the system in a State of Good Repair over the period of the Plan. This amounts to an average annual per capita investment of about \$780 per person (in nominal dollars) for each year of the Plan period, or about \$2.00 per person per day. Connect SoCal 2024 identifies approximately \$75 billion to address the preservation, operation and resilience needs of the state highway infrastructure system. The draft Connect SoCal 2024 also allocates over \$87 billion for operations and maintenance of regionally significant local streets and roads. Figure 4-3 displays the current pavement condition of the state highway system. SCAG will continue to collaborate with federal, State and local partners to monitor the conditions of transportation assets and pursue new research and partnerships to ensure plan resources are deployed to address the region's greatest vulnerabilities. For final Plan investment information, please see the Transportation Finance Technical Report.</p>

ID	COMMENT	RESPONSE
0001768.20	211 Figure 4-5 What is the reason for declining delay under baseline (2050) conditions compared to base year (2019)?	Declining delay under baseline (2050) conditions compared to the base year (2019) is due to a multitude of model assumptions affecting the baseline (2050) output. For example, the model assumes an increase in the amount of teleworking in the region, which translates to fewer commute trips, which translates to less traffic congestion, which translates to less delay.
0001768.21	213 Figure 4-6 Does the total delay include additional facility types other than the 3 facility types shown (highway, HOV, arterial)? The sum of each facility type for each scenario does not add up to the total delay (i.e. for base year 2019, 1,249 +52 +828 = 2,129, not 2,214).	Yes, "Total Delay" includes additional facility types (beyond "Highway," "HOV," and "Arterial"), which are grouped under an "Other" category. For this reason, the totals displayed for each of the three facility types listed do not add up to the amounts listed under "Total Delay."
0001768.22	213 The introduction of truck delay in Figure 4-7 seems abrupt and does not appear to relate specifically to the descriptions preceding it.	Comment noted. There is a discussion regarding truck delay in the paragraph immediately preceding Figure 4-7: "Figure 4-7 shows the estimated average daily truck delay by facility type. Connect SoCal 2024 is estimated to reduce truck delay by 19 percent over Baseline conditions for the category of highway/expressway, with 18.1 percent over Baseline conditions for the arterials." Please see the Goods Movement Technical Report for additional information regarding freight/truck travel in the SCAG region.
0001768.23	221 Last sentence of the first paragraph under Section 4.8.2 states that condition of our roadways has progressively worsened over time and will continue to worsen without investment. Recommend showing data that clearly demonstrate this deficiency.	Comment noted. For more discussion of how roadway conditions will deteriorate without needed investment, please see the 2023 California Statewide Local Streets and Roads Needs Assessment, available at: https://www.savecaliforniastreet.org/wp-content/uploads/2023/05/Statewide-Needs-2022-FINAL.pdf . Also see Connect SoCal 2024 Fact Sheet at: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024_factsheet-general-final4-web.pdf?1699491706
0001768.24	223 Recommend including discussion in Section 4.8.3 on how to address competing priorities when it comes to funding system preservation (fix-it-first) vs investing improvements in priority equity communities that have historically been underdeveloped.	SCAG is revising the text to read: "While these approaches are not mutually exclusive, an equitable approach to addressing system preservation needs may require that implementing jurisdictions navigate complex tradeoffs between a Fix-It-First-oriented approach to system preservation and approaches centering investment in Priority Equity Communities. Implementing jurisdictions should carefully consider any associated tradeoffs and broader implications for system preservation."
0001768.25	225 Section 4.9 is difficult to follow as the subsections jump from one topic to a series of Performance Measures without structure or much introduction. It is unclear how targets are set for each performance measure and why the Year 2025 is set as the benchmark.	Comment noted. As stated in the introductory paragraph - the common thread between the subsections under 4.9 is that they are all "[k]ey strategies to support the future we envision[.]" 2025 is used as the benchmark year in this instance because the PM 2 & PM 3 federal transportation performance management cycle is based on 4-year reporting periods, and the current 4-year reporting interval ends on Dec 31, 2025.
Submitted by	Orange County Transportation Authority	Submittal 0001770
0001770.01	228 Provide sources and descriptions of the the targets shown in Figure 4-10 and 4-11. There is no information in the texts on how the targets are derived.	Please see Performance Monitoring Technical Report for details. These figures are repeated here for convenience of the reader.
0001770.02	240 Section 4.10.7 includes discussion on AVs/CAVs and truck platooning technology which are not necessarily clean air vehicles. Consider revising the title to "Transportation Technology and Vehicles"	The section header is changed to "Clean Transportation Technology and Connected Autonomous Vehicles"
0001770.03	241 2nd paragraph mentions TOD. Clarify the part clean transportation technology plays in the development of TOD.	Comment noted. SCAG recognizes that clean transportation technology is integral to the successful development of Transit-Oriented Development (TOD). By incorporating zero-emission infrastructure (e.g., EV charging stations), zero emission public transit, and other sustainable transportation modes, TODs can greatly reduce environmental impacts, enhancing both connectivity and accessibility.
0001770.04	Appendix 10/ Pg 5 Include plans " Orange County Bike Connectors (OC Loops) Gap Closure Feasibility Study" (2023) & "OC Loop 70/30 Plan" (2015)	Appendix 10 is updated to include two new rows for Orange County Transportation Authority: Orange County Bike Connectors (OC Loops) Gap Closure Feasibility Study" (2023) & "OC Loop 70/30 Plan" (2015)

ID	COMMENT	RESPONSE
0001770.05	Pg. 1 "However, the IJA expires in Fiscal Year (FY)..” – specify it is “Federal” fiscal year.	Comment noted.
0001770.06	Pg. 6 The State Highway System Management Plan (SHSMP) was updated in 2023. Funding need, revenue amount, as well as dedicated climate adaptation funding amounts have been updated. Updated information is on page 8-2 of 2023 SHSMP.	The appropriate changes are incorporated to update Section 2.5 of the Transportation Finance Technical Report.
0001770.07	Pg. 7 Pg. 9/Table 1 Pg. 16/Table 3.1 Section 2.6 acknowledged that local sales taxes for three counties will expire during the term of the Plan, including Orange County’s Measure M in 2041. However, the core revenue forecast shown in Table 1 show a significant increase in funding in OC for the period of FY2045-2050 (\$25.1 billion in FY2045-2050 compared to \$18.3 billion in FY 2040-2044 and \$17.6 billion in FY2035-2039. Recommend providing clarification on the revenue increase beyond the expiration of local sales tax measures (i.e. inflationary adjustments or additional funding sources). SCAG should also further emphasize that extensions of expiring sales tax measures are not assumed in the revenue forecast.	Comment noted. The last “bucket” (FY2045-FY2050) includes six years instead of five years because the Plan period is 26 years. The extra year, in combination with presenting the totals in nominal dollars, accounts for the appearance of a relative increase in that column. The Plan includes the assumption that Measure M2 ends in 2041.
0001770.08	Pg. 8 Last sentence states that Table 1 shows the core revenues in five-year increments. Suggest adding clarification that the period for FY2045-FY2050 includes 6 years.	Table 1 is updated to include note that FY2045-FY2050 includes six years, in contrast to other columns that include five-year totals.
0001770.09	Pg. 14-15 While the number is available later in the report, Table 2 should include the total sum of new reasonably available revenue.	Comment noted. Table 2 gives descriptions of new reasonably available revenues. Totals are presented in Table 3 for all revenue sources by type.
0001770.10	Pg. 17 Provide clarification on the assumptions for TCA development impact fee program through the life of the RTP (i.e. does the revenue decline over time as developments are built out?)	Comment noted. Further information on the revenue source analysis, including growth rates, is addressed in Appendix 1 of the Transportation Finance Technical Report. The TCA development impact fee is forecast to remain constant at 0.0% real growth throughout the Plan period.
0001770.11	Pg. 18, Table 3.2 Appendix 1, Pg. 4 Under STIP, it was stated that the decline of gas tax revenues is offset by Road Improvement Fee (RIF) revenues. Please clarify what the fee is referring to. It is our understanding that the tax increment financing (TIF) funding (the fee on zero emission vehicles) supports the Public Transportation Account (PTA). This funding is further split with a percentage going to the State where the State takes funds off the top to backfill weight fees that are used to pay down debt. PTA is supposed to support the STIP but there typically isn't any left over after paying for local improvements such as intercity rail. To our understanding, there is no other funding currently included in the STIP fund.	Comment noted. The Road Improvement Fee (RIF) is a registration fee applied to all 2020 model year and later zero-emission vehicles to mainly fund road maintenance and rehabilitation through the Road Maintenance & Rehabilitation Programs (RMRA) and is intended to address reduced gas tax revenues resulting from EV penetration. The Transportation Improvement Fee (TIF) is a portion of the vehicle registration fee that applies to all vehicles and is based on market value of the vehicle. The TIF provides revenues for multiple transportation funding accounts, including RMRA, the Public Transportation Account (PTA), and the State Highway Account (SHA).
0001770.12	Pg. 18 Consider updating the plan with 2024 STIP fund estimate that was published in August 2023.	Comment noted. SCAG reviewed the 2024 STIP fund estimate and the SCAG financial forecast is consistent with the 2024 estimate. The Plan will be updated as needed through the amendment process to reflect the adopted 2024 STIP.
0001770.13	Pg. 21, Table 4 Under local option sales taxes, a potential risk of inability to gain voter approval to renew any expiring measures should be included.	Comment noted. The plan does not include the assumption that existing transportation sales taxes will be renewed.
0001770.14	Pg. 28, 31 Both Table 5 and Table 6 refer to service expansion. Recommend adding language that differentiates what is included in each table. For example, specify infrastructure and equipment required for service expansion in Table 5. Also clarify if operating costs are included in Table 6 as the text description only suggests system preservation and maintenance needs.	Table 6 is revised to clarify inclusion of operating costs. Capital costs of service expansion are included in Table 5. Operation and maintenance costs of service expansion are included in Table 6.

ID	COMMENT	RESPONSE
0001770.15	Pg. 30-31 Descriptions in this section mainly focuses on street preservation but only touch lightly on preservation of transit assets. The funding need for transit, however, is at least twice that of streets and roads. Suggest adding descriptions of existing transit needs (e.g. there are X number of buses and rail cars in our region that must be maintained in good working order as well as X miles of track infrastructure).	Comment noted. Transit O&M, including preservation, is discussed in Section 4.2. Further details on transit system preservation and asset management are included in the Mobility Technical Report.
0001770.16	Pg. 31 "... maintain exiting transit" should be "existing".	This is an error and is corrected.
0001770.17	Pg. 34-35, Table 7 There is a significant increase in revenues between the 2040-44 and 2045-49 periods, greater than any other time period. The increase seems exaggerated and requires further verification and clarification. Is the disproportionate forecast due to inflationary increase?	The last "bucket" (FY2045-FY2050) includes six years instead of five tears because the Plan period is 26 years. The extra year, in combination with presenting the totals in nominal dollars, accounts for the appearance of a relative increase in that column. The Plan includes the assumption that Measure M2 ends in 2041.
0001770.18	Appendix 1, Pg. 9 Newer estimates are available for CMAQ and STBG. The new apportionment levels under IJJA are higher. Recommend updating with estimates for FY23/24.	Comment noted. The Connect SoCal financial plan incorporates IJJA apportionment levels in the revenue forecast. Revised CMAQ and STBG apportionment actuals and estimates have also been incorporated into the FTIP for programming.
Submitted by	Orange County Transportation Authority	Submittal 0001771
0001771.01	Table 2 RTP ID ORA030605 - Update completion year to 2023. This comment was previously submitted via e-mail.	Please see response to comment #0001668.01.
0001771.02	Table 2 RTP ID 2M0732 - Update lead agency from OCTA to Caltrans. This comment was previously submitted via e-mail.	The lead agency has been revised to Caltrans for RTP ID #2M0732. The update will be reflected in the Final Project List Technical Report.
0001771.03	Table 1 & 2 RTP ID ORA172201 - Inconsistent costs between the FTIP listing (Table 1) and the Constrained Project listing (Table 2).	Comment noted. RTP ID #ORA172201 will be revised so the project cost is consistent in both Table 1 and 2 as part of the Final Project List Technical Report.
0001771.04	Table 2 RTP ID 2200T003 - Cost matches FTIP cost for ORA172201, is this a duplicate of ORA172201?	Comment noted. RTP ID #2200T003 is a duplicate of FTIP/RTP ID #ORA172201/ORA110613 and has been removed from the Final Project List Technical Report.
0001771.05	Table 3 RTP ID S2120056 - remove; project has been removed from the OCTA LRTP.	Comment noted. Please see response to Comment ID #0001771.07.
0001771.06	Table 3 Remove the following projects as they have been moved to the constrained project list: RTP ID S2120062, S2120063, S2120064 and S2120065.	The projects identified for removal are financially unconstrained and do not result in impacts to transportation conformity or financial constraint and are removed from Table 3 of the Final Project List Technical Report.
0001771.07	Table 3 Remove the following projects: - RTP ID S2003L001 - IMPLEMENT OC INTERSECTION ASSESSMENT RECOMMENDATIONS - RTP ID S2003L004 - IMPLEMENT COUNTYWIDE COMMUNICATIONS STUDY (ITS) RECOMMENDATIONS - RTP ID S2120056 - CONSTRUCT GRADE SEPARATED INTERSECTION AT HARBOR BOULEVARD AND BALL ROAD - RTP ID S2160003 - LOSSAN / NEWPORT AVE GRADE SEPARATION - RTP ID S2160004 - LOSSAN / RED HILL AVE GRADE SEPARATION - RTP ID S2120035 - 405 ADD HOV RAMPS AT BEAR STREET - RTP ID S2120036 - 405 ADD HOV RAMPS AT VON KARMAN AVENUE - RTP ID S2120024 - FULLERTON TRANSPORTATION CENTER STATION IMPROVEMENTS - RTP ID S2120028 - SANTA ANA REGIONAL TRANSPORTATION CENTER STATION IMPROVEMENTS	The projects identified for removal are financially unconstrained and do not result in impacts to transportation conformity or financial constraint and are removed from Table 3 of the Final Project List Technical Report.

ID	COMMENT	RESPONSE
0001771.08	Table 3 RTP ID S2003L002 - revise description to "IMPLEMENT MPAH COMPLETE STREETS ASSESSMENT RECOMMENDATIONS - REUSE OF EXCESS CAPACITY"	RTP ID #S2003L002 is revised as noted in Table 3 of the Final Project List Technical Report. The project is financially unconstrained and revising does not result in impacts to transportation conformity or financial constraint.
0001771.09	Table 3 RTP ID S2160011 - revise description to match OCTA LRTP: "SR-73, SR-261, SR-241 NORTH - BUILDOUT TO PLANNED CAPACITY"	RTP ID #S2160011 is revised as noted in Table 3 of the Final Project List Technical Report. The project is financially unconstrained and revising does not result in impacts to transportation conformity or financial constraint.
0001771.10	Table 3 RTP ID S1161O001 - Correct county column to "Los Angeles"	RTP ID S1161O001 is corrected to reflect Los Angeles under the county column in Table 3 of the Final Project List Technical Report.
0001771.11	Table 3 Add Orange County project as followed. Description: PEDESTRIAN BRIDGE IMPROVEMENTS IN THE ANAHEIM RESORT AREA Lead Agency: Anaheim	Comment noted. The addition of the financially unconstrained project into Table 3 has no impact on transportation conformity or financial constraint and is included in Table 3 of the Final Project List Technical Report.
0001771.12	Table 3 Add Orange County project as followed. Description: P133/GREAT PARK BLVD INTERCHANGE Lead Agency: Irvine	Comment noted. The addition of the financially unconstrained project into Table 3 will have no impact on transportation conformity or financial constraint and will therefore be included in Table 3 of the Final Project List Technical Report.
0001771.13	Table 3 Add Orange County project as followed. Description: SR-55 - EXTEND ML TO SOUTHERN TERMINUS Lead Agency: OCTA	Comment noted. The addition of the financially unconstrained project into Table 3 has no impact on transportation conformity or financial constraint and is included in Table 3 of the Final Project List Technical Report.
0001771.14	Table 3 Add Orange County project as followed. Description: ENHANCED EAST/WEST OCTA TRANSIT CONNECTING ARTIC MOBILITY HUB TO AREAS OF HIGH DEMAND Lead Agency: OCTA	Comment noted. The addition of the financially unconstrained project into Table 3 has no impact on transportation conformity or financial constraint and is included in Table 3 of the Final Project List Technical Report.
0001771.15	Table 3 Add Orange County project as followed. Description: NEW SOUTHERN OC METROLINK STATION Lead agency: OCTA	Comment noted. The addition of the financially unconstrained project into Table 3 has no impact on transportation conformity or financial constraint and is included in Table 3 of the Final Project List Technical Report.
Submitted by	Port of Long Beach	Submittal 0001718
0001718.01	On Page 66 of main draft, POLB proposes adding ' Gerald Desmond Bridge Replacement Project (Long Beach International Gateway Bridge)', which was opened on October 2nd, 2020, to list of projects that have been implemented. The project connects Terminal Island with Downtown Long Beach, and is a part of the state highway system.	The Gerald Desmond Bridge Replacement Project is added to the Plan Implementation section of Chapter 2.
0001718.02	On Page 52 of Goods Movement, confirm sunset date for the Clean Truck Fund? Is it ending in 2023 or continuing onwards?	Section 3.2 Regional and Local Policies, Page 52, first bullet, last sentence is updated to state, "The program is funded through a rate charged on loaded containers moved by drayage trucks through the ports, with exemptions for zero emission and some low-NOx trucks and is designed to help trucking companies transition to zero emission technologies while improving air quality in the surrounding communities. The program began on April 1, 2022, and is scheduled to run through 2035 and has collected over \$130 million in funding to help replace older, high-emitting trucks with cleaner alternatives."

ID	COMMENT	RESPONSE
0001718.03	On Page 140 of Goods Movement, POLB proposes adding to projects completed since Connect SoCal 2020 - 'Pier G/J Double Track', completed April 2022 and closed out October 2022, creating a new 9,000-foot departure track for trains serving four marine terminals along the East Basin: Pier J PCT, Pier G ITS, Pier G Metro, and Pier E/F LBCT, removing one track from the railyard, totaling 1,800 feet, and adding 7 new tracks totaling 5,700 feet to storage yard east of Pier J Ave.	Section 7.5.1 Seaport Strategies, bulleted section is updated to include a new bullet that states, "Pier G/J Double Track, completed April 2022 and closed out October 2022, creating a new 9,000-foot departure track for trains serving four marine terminals along the East Basin, removing one track from the railyard, and adding 7 new tracks to storage yard east of Pier J Ave."
0001718.04	On Page 146 of Goods Movement, POLB proposes that 'Harbor Scenic Drive' should be added to the key short-term projects list. Harbor Scenic Roadway and Infrastructure Improvements will improve safety, relieve traffic congestion, upgrade infrastructure, increase wayfinding and provide visual enhancements to Harbor Scenic Drive.	Section 7.5.1 Seaport Strategies, bulleted section is updated to include a new bullet that states, "Harbor Scenic Roadway and Infrastructure Improvements. Improve safety, relieve traffic congestion, upgrade infrastructure, increase wayfinding and provide visual enhancements to Harbor Scenic Drive."
0001718.05	On Page 171 of Goods Movement, Pier B Freight Corridor Enhancement Project (A.21) has the same project description as A.9. Project Cost should be \$150,000 (of 000s). On Page 173 of Goods Movement, Pier B Freight Corridor Enhancement Project (A.9) has the same project description as A.21. Project Cost should be \$150,000 (of 000s).	On Page 171, Project A.9 is kept and the cost is reflective of the \$150,000 (\$YOE, 000s) amount. On Page 173, Project A.21 is removed.
0001718.06	On Page 185 of Goods Movement, Pier A On-Dock Rail Yard Expansion to Carrack (E.1-LB) and (E.2-LB) are the same project and should be merged, with overall Project Cost of \$156,355 thus far. Timeframe is L.	On Page 185, Projects E.1-LB and E.2-LB are merged and reflected with overall Project Cost of \$156,355 (\$YOE, 000s) and Timeframe is L.
0001718.07	On Page 187 of Goods Movement, Fourth Track at Ocean (F.1.-LB) is completed as of end of 2023. However, it is still undergoing close out in 2024. Up to SCAG if project is kept in Connect SoCal 2024.	Comment noted. On Page 187, Project F.1.-LB is removed as it is completed in 2023.
0001718.08	On Page 187 of Goods Movement, Pier B On-Dock Rail Support Facility (F.2-LB) has an updated total budget of \$1.417 billion.	Project List (F2.-LB) in the Goods Movement Technical Report, Page 187, project cost is updated to \$440,007 to be consistent with FTIP project LA0C8094. FTIP project LA0C8094 reflects what is currently included in the FTIP. As such, this change request will need to be completed through the FTIP Amendment process in coordination with the lead agency and the applicable county transportation commission.
0001718.09	On Page 27 of Project List, Pier B Intermodal Railyard - Updated total budget for railyard is \$1.417 billion.	Table 1 reflects the project as programmed in the current 2023 FTIP. The full cost is included in Table 2 of the financially constrained project list. See RTP ID #LA0C8094. To update programming in the FTIP, please work with LA Metro who is responsible for submitting programming updates to SCAG.
0001718.10	On Page 27 of Project List, South Waterfront Bike Path - Completed. Closeout anticipated for April 2024. Up to SCAG whether or not to remove.	FTIP Project ID #LAF3503 is completed in the approved 2023 FTIP and will be removed from the Project List Technical Report of the Connect SoCal-2024 RTP/SCS as requested.
0001718.11	On Page 27 of Project List, Middle Harbor Terminal Redevelopment Program - Completed. Closeout completed on April 2023. Remove from Project List.	The referenced project FTIP ID #LA0G1403 is programmed in the 2023 FTIP and completed as described. It will be removed from the Final Connect SoCal-2024 RTP/SCS Project List Technical Report.
0001718.12	On Page 27, Coastal Bike Trail Connector - Completed. Closeout anticipated for April 2024. Up to SCAG whether or not to remove.	Projects will be removed from the Project List Technical Report if noted as completed in the approved FTIP. FTIP ID #LATP16M010 remains programmed in the 2023 FTIP.
0001718.13	On Page 28 of Project List, Fourth Track at Ocean - Construction Complete. Closeout anticipated for August 2024. Up to SCAG whether or not to remove.	Projects will be removed from the Project List Technical Report if noted as completed in the approved FTIP. FTIP ID #LA9918957 remains programmed in the 2023 FTIP.
0001718.14	On Page 208 of Project List, Pier B Rail Yard (Phase III) - Is a part of/overlaps with Pier B Intermodal Railyard (LA0C8094)	Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. Please communicate with LA Metro to update FTIP ID #LA0C8094 to rescope the project and remove the portion that overlaps with RTP ID #1O0701.
Submitted by	Port of Los Angeles	Submittal 0001815

ID	COMMENT	RESPONSE
0001815.01	<p>2. Please revise the highlighted portion of the following paragraph from the Goods Movement Technical Report, Page52 (Page 54/198):</p> <p>“The Clean Air Action Plan (CAAP).....The program is funded through a [insert] rate charged on loaded containers moved by drayage trucks through the ports, with exemptions for zero-emission and some low-NOx trucks and is designed to help trucking companies transition to zero emission technologies while improving air quality in the surrounding communities. The program began on April 1, 2022, and is scheduled to run through 2035 and has collected over \$130 million in funding to help replace older, high-emitting trucks with cleaner alternatives.[end insert] [strikeout] tariff on containers moving through the ports and is designed to help trucking companies transition to cleaner technologies while improving air quality in the surrounding communities.</p> <p>The program is scheduled to run through 2023 and has provided over \$78 million in funding to help replace older, high-emitting trucks with cleaner alternatives.”[end strikeout]</p> <p>[See Port of Los Angeles comment letter in attachment for denoted edits.]</p>	The suggested edits will be incorporated in the technical report.
0001815.02	<p>3. There are certain references throughout the Goods Movement Technical Report (https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-connect-social-2024-goodsmovement-draft-110223.pdf?1698263285) regarding innovative concepts, such as Hyperloop. Please verify if the references are still valid given Hyperloop One company announced its closure last year.</p>	The references throughout the Goods Movement Technical Report regarding hyperloop technologies are not impacted from the Hyperloop One company closure.
0001815.03	<p>1. Please revise the Port of Los Angeles’ RTP list of projects per the attached document.</p> <p>The Port of Los Angeles RTP List of Project [sic]</p> <p>FTIP PROJECTS</p> <p>LOS ANGELES LOCAL HIGHWAY LA9919170 PORT OF LOS ANGELES CONSTRUCTION OF A FOUR-LANE, RAILROADWAY GRADE SEPARATION THAT ELIMINATES A SIGNIFICANT TRUCK ACCESS IMPEDIMENT TO AN IMPORTANT CONTAINER TERMINAL SUPPORT FACILITY LOCATED ON TERMINAL ISLAND, AT THE CENTROID OF THE PORTS OF LOS ANGELES-LONG BEACH (POLA-POLB). \$39,670</p> <p>Project Completion: Jun-26</p>	FTIP project LA9919170 reflects what is currently included in the FTIP. As such, this change request will need to be completed through the FTIP Amendment process in coordination with the lead agency and the applicable county transportation commission.
0001815.04	<p>FTIP PROJECTS</p> <p>LOS ANGELES LOCAL HIGHWAY LA0G1543 PORT OF LOS ANGELES TERMINAL ISLAND RAILYARD ENHANCEMENT PROJECT. THIS PROJECT ENTAILS THE CONSTRUCTION OF FIVE STAGING/STORAGE TRACKS ABOUT 47,000 LINEAL FEET (47,000 LF = 31,000 LF OF STORAGE TRACKS + 16,000 LF OF CONNECTIONS) TO THE AN EXISTING RAIL YARD, LOCATED ON TERMINAL ISLAND, WHICH IS ALSO INCLUDES A SHORT RAIL BRIDGE OVER WATER. \$61,395</p> <p>Project Completion: May-24</p>	FTIP project LA0G1543 reflects what is currently included in the FTIP. As such, this change request will need to be completed through the FTIP Amendment process in coordination with the lead agency and the applicable county transportation commission.
0001815.05	<p>FTIP PROJECTS</p> <p>LOS ANGELES LOCAL HIGHWAY LA0G173 PORT OF LOS ANGELES RECONFIGURATION OF CONTROL POINT (CP) MOLE - THE NEW CONTROL POINT AT THE MOLE WILL ENABLE INCREASED TRAIN SPEEDS AND REDUCED TRAIN DELAYS CAUSED BY MANUAL SWITCH OPERATIONS. \$24,000</p> <p>SCAG EDITS (KC): remove; correctly listed in "constrained list" (1200P002); no federal/State funding in place</p>	FTIP project LA0G173 reflects what is currently included in the FTIP. As such, this change request will need to be completed through the FTIP Amendment process in coordination with the lead agency and the applicable county transportation commission.

ID	COMMENT	RESPONSE
0001815.06	<p>FTIP PROJECTS LOS ANGELES LOCAL HIGHWAY LA0G1540 PORT OF LOS ANGELES ALAMEDA CORRIDOR SOUTHERN TERMINUS GAP CLOSURE PROJECT. THIS PROJECT WILL PROVIDE SEPARATE RAIL ACCESS TO TWO ADJACENT ON-DOCK RAILYARDS, THUS ELIMINATING THE POTENTIAL FOR TRAIN COLLISIONS. THE NEW DOUBLE TRACK SEGMENT WILL ALSO REDUCE MOVING TRAIN BLOCKAGES AT TWO IMMEDIATELY ADJACENT RAIL CROSSINGS ON ROADWAYS, WHICH ALSO REDUCES THE POTENTIAL FOR TRAINVEHICULAR COLLISIONS. \$14,050</p> <p>Project Completion: Completed</p>	<p>FTIP project LA0G1540 reflects what is currently included in the FTIP. As such, this change request will need to be completed through the FTIP Amendment process in coordination with the lead agency and the applicable county transportation commission.</p>
0001815.07	<p>FTIP PROJECTS LOS ANGELES LOCAL HIGHWAY LA9918927 PORT OF LOS ANGELES THE PROJECT WILL ADD FIVE NEW WORKING TRACKS JUST NORTH OF/PARALLEL TO THE EXISTING FENIX ON-DOCK RAILYARD, INCLUDING TAIL TRACK, PAVEMENT AND TURNOUTS. A TOTAL OF 15,000 LINEAR FEET OF TRACK WILL BE ADDED AS PART OF THIS PROJECT. \$52,355</p> <p>Project Completion: Jan-27</p>	<p>FTIP project LA9918927 completion date is consistent with the current FTIP. No change is required.</p>
0001815.08	<p>FTIP PROJECTS LOS ANGELES LOCAL HIGHWAY LA9918926 PORT OF LOS ANGELES THE AVALON PROMENADE AND GATEWAY PROJECT WILL DEVELOP THE 12-ACRES SITE SOUTH OF HARRY BRIDGES BLVD ALONG AVALON BOULEVARD AND WILL CONSTRUCT A SIGNATURE PEDESTRIAN BRIDGE (APPROXIMATELY 440 LINEAR FEET), WHICH WILL IMPROVE PEDESTRIAN ACCESS TO THE WILMINGTON WATERFRONT. A PEDESTRIAN BRIDGE WILL PROVIDE SAFE AND DIRECT PEDESTRIAN ACCESS OVER THE PACIFIC HARBOR RAIL LINE TRAIN TRACKS AND REALIGNED WATER STREET. \$23,800</p> <p>Project Completion: Jun-27</p>	<p>FTIP project LA9918926 reflects what is currently included in the FTIP. As such, this change request will need to be completed through the FTIP Amendment process in coordination with the lead agency and the applicable county transportation commission.</p>
0001815.09	<p>FTIP PROJECTS LOS ANGELES STATE HIGHWAY LA0G1290 47 PORT OF LOS ANGELES PREPARE CALTRANS PROJECT STUDY REPORT (PSR), PROJECT REPORT (PR), PRELIMINARY PLANS AND ENVIRONMENTAL DOCUMENTATION (ED) REPORTS TO OBTAIN CALTRANS APPROVAL AND ENVIRONMENTAL CLEARANCE; DESIGN (PLANS, SPECIFICATION AND ESTIMATE) AND CONSTRUCTION FOR THE SR 47/VINCENT THOMAS BRIDGE AND FRONT STREET/HARBOR BOULEVARD INTERCHANGE RECONFIGURATION PROJECT. \$70,500</p> <p>Project Completion: Nov-26</p>	<p>FTIP project LA0G1290 reflects what is currently included in the FTIP. As such, this change request will need to be completed through the FTIP Amendment process in coordination with the lead agency and the applicable county transportation commission.</p>
0001815.10	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES LOCAL HIGHWAY PORT OF LOS ANGELES 1160005 SAMPSON WAY TO 22ND STREET & MINER STREET - SAMPSON WAY WOULD BE REALIGNED AND EXPANDED TO TWO LANES IN EACH DIRECTION AND WOULD CURVE NEAR THE MUNICIPAL FISH MARKETS TO MEET WITH 22ND STREET IN ITS WESTWARD ALIGNMENT EAST OF MINER STREET. 2025 \$30,000</p> <p>Project Completion: 2030</p>	<p>Financially Constrained project 1160005 completion year is updated to 2030 in the project list.</p>

ID	COMMENT	RESPONSE
0001815.11	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES LOCAL HIGHWAY PORT OF LOS ANGELES1160006 HARBOR BLVD WB SR47 ON-RAMP 7TH STREET HARBOR BLVD IMPROVEMENTS - AS PART OF THE SAN PEDRO WATERFRONT DEVELOPMENT PROJECT, HARBOR BLVD WILL BE RESTRIPE, AND THE MEDIAN IS REMOVED/RECONSTRUCTED AS NEEDED TO PROVIDE THREE NBT AND SBT LANES BETWEEN THE RECONSTRUCTED HARBOR BLVD./7TH ST. INTERSECTION AND THE WB ON RAMP/FRONT STREET INTERSECTION. THIS WILL RESULT IN THE REMOVAL OF PARKING AND THE BIKE LANE ON THE NORTHBOUND SIDE. THE PARKING AND 5' BIKE LANE ON THE SOUTHBOUND SIDE, SOUTH OF O'FARRELL STREET WILL BE PRESERVED. NORTH OF O'FARRELL STREET, THE PARKING AND THE PARKING LANE ON THE SOUTHBOUND SIDE WOULD NEED TO BE REMOVED TO ACCOMMODATE THE NORTHBOUND DUAL LEFT-TURN LANE. 2027 \$5,000</p> <p>Project Completion: 2030</p>	Financially Constrained project 1160006 completion year is updated to 2030 in the project list.
0001815.12	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES LOCAL HIGHWAY PORT OF LOS ANGELES1160007 ALAMEDA CORRIDOR SOUTH TERMINUS/HENRY FORD AVE. RAIL CROSSING ADVANCED WARNING SYSTEM.2025 \$15,000</p> <p>Project Completion: 2030</p>	Financially Constrained project 1160007 completion year is updated to 2030 in the project list.
0001815.13	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES LOCAL HIGHWAY PORT OF LOS ANGELES224P001 PROVIDES STORAGE FOR CONTAINERS AND CHASSIS FOR POLA-POLB 2025 \$160,000</p> <p>SCAG EDITS (KC): remove; repeat of 11630003</p>	Financially Constrained project 224P001 is removed from the project list.
0001815.14	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES LOCAL HIGHWAY PORT OF LOS ANGELES1200L001 HARBOR BLVD SP SLIP 22ND STREET DESIGN HARBOR BLVD. (FORMERLY KNOWN AS SAMPSON WAY) INTO A SCENIC BOULEVARD ALONG THE WEST PERIMETER OF PORTS O'CALL VILLAGE. THIS PROJECT WILL FACILITATE PUBLIC ACCESS THROUGHOUT THE WATERFRONT AREA TO BETTER CONNECT THE WATERFRONT WITH DOWNTOWN SAN PEDRO AND THE SURROUNDING COMMUNITY. THIS PROJECT WILL BEGIN AT THE SP SLIP AND END AT 22ND STREET. 2024 \$22,000</p> <p>Project Completion: 2030</p>	Financially Constrained project 1200L001 completion year is updated to 2030 in the project list.
0001815.15	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES STATE HIGHWAY PORT OF LOS ANGELES1120007 47 SE-47/VINCENT THOMAS BRIDGE ON/OFF RAMP IMPROVEMENTS: NEW WESTBOUND SR-47 ON- AND OFF RAMPS AT FRONT STREET JUST WEST OF THE VINCENT THOMAS BRIDGE AND ELIMINATE THE EXISTING NON STANDARD RAMP CONNECTION TO THE HARBOR BOULEVARD OFF-RAMP; FRONT STREET IS AN NHS CONNECTOR. THE PROJECT ALSO INCLUDES REALIGNED EASTBOUND AND WESTBOUND SR47 ON RAMPS. 2026 \$105,000</p> <p>SCAG EDITS (KC): in FTIP (LA0G1290); remove from FC</p>	Financially Constrained project 1120007 is removed from the project list.
0001815.16	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES STATE HIGHWAY PORT OF LOS ANGELES1M0430 47 SR-47 AT NAVY WAY SR 47/NAVY WAY INTERCHANGE: CONSTRUCTION OF INTERCHANGE AT SR47 / NAVY WAY TO ELIMINATE TRAFFIC SIGNAL AND MOVEMENT CONFLICTS; PROJECT REMOVES LAST SIGNAL ON SR 47 BETWEEN DESMOND AND V. THOMAS BRIDGES; NHS INTERMODAL CONNECTOR ROUTE 2027 \$63,000</p> <p>Project Completion: 2029</p>	Financially Constrained project 1M0430 completion year is updated to 2029 in the project list.

ID	COMMENT	RESPONSE
0001815.17	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES OTHER PORT OF LOS ANGELES 1161L007 PORT OF LOS ANGELES ALAMEDA CORRIDOR TERMINUS/CALIFORNIA COASTAL TRAIL EXTENSION GRADE SEPARATION (PEDESTRIAN/CLASS I BICYCLE PATH BRIDGE OVER FREIGHT MAINLINE): PROVIDE A PEDESTRIAN/BICYCLE BRIDGE OVER TWO RAIL MAINLINE TRACKS TO PROVIDE A DIRECT CONNECTION BETWEEN THE WILMINGTON COMMUNITY AND THE WATERFRONT.2024 \$23,800</p> <p>SCAG EDITS (KC): in FTIP (LA9918926); remove from FC</p>	Financially Constrained project 1161L007 is removed from the project list.
0001815.18	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES OTHER PORT OF LOS ANGELES 1163O003 PORT OF LOS ANGELES PORT OF LOS ANGELES TERMINAL ISLAND MARITIME SUPPORT FACILITY (MSF) 2026 \$160,000</p> <p>SCAG EDITS (KC): note the edit: removal of Grade sep, which is LA9919170; the MSF will also be added to FTIP with awarded PFIP funds</p> <p>Project Completion: Aug-27</p>	Financially Constrained project 1163O003 completion year is updated to August 2027 and the project description is updated to state, "TERMINAL ISLAND MARITIME SUPPORT FACILITY (MSF)."
0001815.19	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES OTHER PORT OF LOS ANGELES 1163O004 PORT OF LOS ANGELES ZERO EMISSION (ZE)/TRUCK TRIP REDUCTION/FREIGHT EFFICIENCY PROGRAM: WEST BASIN CONTAINER TERMINAL RAILYARD - RECONSTRUCT A 7- TRACK RAILYARD OPERATED WITH DIESEL POWERED TOP-PICKS TO A 10- TRACK RAILYARD OPERATED WITH ELECTRIFIED RAIL-MOUNTED GANTRY CRANES 2030 \$110,000</p> <p>Project Completion: 2029</p>	Financially Constrained project 1163O004 completion year is updated to 2029 in the project list.
0001815.20	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES OTHER PORT OF LOS ANGELES 1200P002 PORT OF LOS ANGELES PORT OF LOS ANGELES ZERO EMISSION (ZE)/TRUCK TRIP REDUCTION/FREIGHT EFFICIENCY PROGRAM: POLA RAIL SYSTEM PROJECTS (CP MOLE, PIER 400 SECOND LEAD TRACK, WEST BASIN 2ND LEAD TRACK, B200 RAILYARD CONNECTION - 2ND TRACK) 2026 \$70,000</p> <p>Project Completion: 2030</p>	Financially Constrained project 1200P002 completion year is updated to 2030 in the project list.
0001815.21	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES OTHER PORT OF LOS ANGELES 100706LA02 PORT OF LOS ANGELES ZERO EMISSION (ZE)/TRUCK TRIP REDUCTION/FREIGHT EFFICIENCY PROGRAM: TERMINAL ISLAND ON-DOCK RAILYARD EXPANSION (TICTF MODERNIZATION).2030 \$100,000</p> <p>Project Completion: 2035</p>	Financially Constrained project 100706LA02 completion year is updated to 2035 in the project list.
0001815.22	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES OTHER PORT OF LOS ANGELES 100707 PORT OF LOS ANGELES ZERO EMISSION (ZE)/TRUCK TRIP REDUCTION/FREIGHT EFFICIENCY PROGRAM: NEW CERRITOS CHANNEL RAIL BRIDGE 2030 \$400,000</p> <p>Project Completion: 2035</p>	Financially Constrained project 100707 completion year is updated to 2035 in the project list.
0001815.23	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES OTHER PORT OF LOS ANGELES 100708 PORT OF LOS ANGELES ZERO EMISSION (ZE)/TRUCK TRIP REDUCTION/FREIGHT EFFICIENCY PROGRAM: TRIPLE TRACK S/O THENARD 2030 \$34,015</p> <p>Project Completion: 2035</p>	Financially Constrained project 100708 completion year is updated to 2035 in the project list.

ID	COMMENT	RESPONSE
0001815.24	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES OTHER PORT OF LOS ANGELES 1O0710A PORTS OF LOS ANGELES PORT OF LOS ANGELES ZERO EMISSION (ZE)/TRUCK TRIP REDUCTION/FREIGHT EFFICIENCY PROGRAM: PIER 300 RAIL EXPANSION PHASE I 2026 \$56,000</p> <p>Project Completion: in FTIP (LA9918927), remove from FC</p>	Financially Constrained project LA9918927 is removed from the project list.
0001815.25	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES OTHER PORT OF LOS ANGELES 1O0710C PORTS OF LOS ANGELES PORT OF LOS ANGELES ZERO EMISSION (ZE)/TRUCK TRIP REDUCTION/FREIGHT EFFICIENCY PROGRAM:PIER 400 RAIL EXPANSION; 2) PIER 300 RAIL EXPANSION PHASE II 2030 \$200,000</p> <p>Project Completion: 2035</p>	Financially Constrained project 1O0710C completion year is updated to 2035 in the project list.
Submitted by	Port of Los Angeles	Submittal 0001816
0001816.01	<p>FINANCIALLY CONTRAINED PROJECTS LOS ANGELES OTHER PORT OF LOS ANGELES 224P020 PORT OF LOS ANGELES ZERO EMISSION (ZE)/TRUCK TRIP REDUCTION/FREIGHT EFFICIENCY PROGRAM:PIER 300 RAILYARD EXPANSION/MODERNIZATION PHASE 1 2025 \$100,000</p> <p>SCAG EDITS (KC): in FTIP (LA9918927), remove from FC</p>	Financially Constrained project 224P020 is removed from the project list.
0001816.02	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES OTHER PORT OF LOS ANGELES 224P021 PORT OF LOS ANGELES ZERO EMISSION (ZE)/TRUCK TRIP REDUCTION/FREIGHT EFFICIENCY PROGRAM: PIER 300 WHARF EXPANSION 2025 \$246,500</p> <p>Project Completion: 2030</p>	Financially Constrained project 224P021 completion year is updated to 2030 in the project list.
0001816.03	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES OTHER PORT OF LOS ANGELES 224P022 PORT OF LOS ANGELES ZERO EMISSION (ZE)/TRUCK TRIP REDUCTION/FREIGHT EFFICIENCY PROGRAM: BERTHS 121-127 IMPROVEMENT 2027 \$335,100</p> <p>Project Completion: 2027</p>	Financially Constrained project 224P022 completion year is updated to 2027 in the project list.
0001816.04	<p>FINANCIALLY CONSTRAINED PROJECT LOS ANGELES OTHER PORT OF LOS ANGELES 224P023 PORT OF LOS ANGELES RAIL MAINLINE/WILMINGTON COMMUNITY & WATERFRONT PEDESTRIAN GRADE SEPARATION BRIDGE 2027 \$60,000</p> <p>SCAG EDITS (KC): in FTIP (LA9918926); remove from FC</p>	Financially Constrained project 224P023 is removed from the project list.
0001816.05	<p>FINANCIALLY CONSTRAINED PROJECTS LOS ANGELES STATE HIGHWAY ALAMEDA CORRIDOR TRANSPORTATION AGENCY LA0D45 47 SR-47 EXPRESSWAY: CONSTRUCT 4 LANE EXPRESSWAY AND 2-LANE FLYOVER TO SCHUYLER HEIM BRIDGE LA0D45 IS SPLIT INTO TWO PROJECTS; LA0D45 (EXPRESS WAY & FLYOVER) AND LA0D45A (BRIDGE REPLACEMENT) 2035 \$420,000</p> <p>Project Completion: 2040</p>	Financially Constrained project LA0D45 reflects what is currently included in the FTIP. As such, this change request will need to be completed through the FTIP Amendment process in coordination with the lead agency and the applicable county transportation commission.

ID	COMMENT	RESPONSE
0001816.06	<p>UNCONSTRAINED PROJECTS LOS ANGELES LOCAL HIGHWAY S1160110 HARBOR BLVD/7TH STREET: RECONFIGURE INTERSECTION AT THE JUNCTION OF HARBOR BLVD, SAMPSON WAY, AND 7TH STREET. WORK INCLUDES RETAINING WALL, STREET WORK, GRADING, PAVING, LIGHTING, RESTRIPING AND A NEW SIGNALIZED INTERSECTION. PORT OF LOS ANGELES</p> <p>SCAG EDITS (KC): remove; project completed in 2018!!</p>	Unconstrained project S1160110 is removed from the project list.
0001816.07	<p>UNCONSTRAINED PROJECTS LOS ANGELES LOCAL HIGHWAY S1160111 RESTRIPE HARBOR BLVD AND RECONSTRUCT MEDIAN TO PROVIDE THREE NBT AND SBT LANES BETWEEN THE RECONSTRUCTED SAMPSON WAY/HARBOR BLVD. INTERSECTION AND THE WB ON RAMP/FRONT STREET INTERSECTION. PORT OF LOS ANGELES</p> <p>SCAG EDITS (KC): remove; repeated, in constrained; (1160006)</p>	Unconstrained project S1160111 is removed from the project list.
Submitted by	Rail Passenger Association of California	Submittal 0001697
0001697.01	<p>Hello! Good morning. My name is Brian Yanity, with the Rail Passengers Association of California, and I'm interested in the project list. I looked online at the materials there. You know the draft EIR, and the draft plan, and I couldn't find the project list anywhere. Is there some appendix it's in or something?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-9 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
Submitted by	Rail Passenger Association of California	Submittal 0001724

ID	COMMENT	RESPONSE
0001724.01	<p>To:</p> <p>Draft Connect SoCal Plan Comments Attn: Connect SoCal Team Southern California Association of Governments 900 Wilshire Blvd., Ste. 1700 Los Angeles, CA 90017</p> <p>[to be submitted via online form]</p> <p>January 11, 2024</p> <p>Re: Public comment on Draft Connect SoCal 2024</p> <p>Dear Connect SoCal,</p> <p>The Rail Passenger Association of California and Nevada (RailPAC) is an all-volunteer non-profit passenger rail advocacy group representing the interests of rail passengers since 1978.</p> <p>RailPAC appreciates this opportunity to provide public comment on the Draft Connect SoCal 2024 Southern California’s Regional Transportation Plan/Sustainable Communities Strategy for the six-county region—as required by federal and state regulations. As the nation’s largest federally-recognized metropolitan planning organization, the Southern California Association of Governments (SCAG) is in a unique position to encourage all levels of government to work together to improve passenger rail service and general mobility in Southern California.</p> <p>Improved regional and intercity passenger rail must be a cornerstone of Southern California’s transportation and land use investments between now and the year 2050. RailPAC sees improved regional and intercity passenger rail as critical, along with complementary improvements in the freight rail system. Aside from the obvious environmental benefits of reducing air pollution and providing additional transportation capacity, efficient passenger rail travel is vital to California’s economic well-being. The livelihood and security of all Californians cannot be dependent upon increasingly congested and deteriorating highways, rail networks and airports. The needs of non-drivers are just as important as those of drivers. Millions of residents in the SCAG region do not drive because they are too young or too old, have a medical condition that prevents them from driving, or cannot afford a car/truck or the fuel needed for all trips. Rail and transit should be viewed in this context. Representation of ‘non-drivers’ thus needed on boards and other representative bodies governing transportation in the SCAG region.</p> <p>Sincerely,</p> <p>Brian Yanity</p> <p>Vice President- South and Board Member, Rail Passenger Association of California and Nevada (RailPAC) Fullerton, California Email: [REDACTED]</p> <p>[specific comments on draft Connect SoCal 2024 plan in attache pdf]</p>	<p>Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region, both within and across cities and counties. Connect SoCal also includes the following strategy that supports creating transit/rail systems that connect more readily: "Enable a more seamless mobility experience through the implementation of Mobility as a Service (MaaS). This may include leveraging Cal-ITP’s support, initiating open-loop payment demonstrations, and testing shared product systems and post-payment solutions." The Mobility Technical Report details additional strategies (e.g., dedicated bus lanes, mobility hubs, asset management, etc.) and investments (e.g., Metrolink’s SCORE Program, California High Speed Rail, etc.) that support growth towards the transportation vision.</p>
Submitted by	Riverside County Transportation Commission	Submittal 0001662

ID	COMMENT	RESPONSE
0001662.01	<p>The Riverside County Transportation Commission would like to formally comment and request that a project be added to the strategic list at this time.</p> <p>Please add the following project to the STRATEGIC LIST: County: Riverside County System: State Highway Description: CONSTRUCT 4 EXPRESS LNS (2 LN EA DIR) FROM SR-91/SR-60/I-215 INTERCHANGE TO SR-60/I-215 INTERCHANGE. CONSTRUCT 2 EXPRESS LNS (1 LN EA DIR) FROM SR-60/I-215 INTERCHANGE TO GILMAN SPRINGS ROAD (SR-60). CONSTRUCT 2 EXPRESS LNS (1 LN EA DIR) FROM SR-60/I-215 INTERCHANGE TO VAN BUREN BLVD (I-215). Lead Agency: Riverside County Transportation Commission</p> <p>This project used to be on the constrained list 2020 RTP as RTP ID 3200S013 but was deleted through the 2024 RTP so we would like to add it to the strategic list.</p> <p>Thank you for your consideration.</p>	<p>Comment noted. The financially unconstrained project has been included in Table 3 of Project List Technical Report.</p>
Submitted by	Riverside Neighbors Opposing Warehouses	Submittal 0001667
0001667.01	<p>The caption [of Map 1] should not cite SCAG as the source for proprietary CoStar data. Please update the caption to cite CoStar, rather than SCAG, as the data source.</p>	<p>The source for Map 1 is updated to state, "SCAG, Costar Group, Inc."</p>
Submitted by	Riverside Neighbors Opposing Warehouses	Submittal 0001676
0001676.01	<p>After our conversation, it is now clear that there are two separate but connected commenting and planning processes – the Connect SoCal 2024 Plan and the Connect SoCal 2024 PEIR; however there is no description that there are two separate processes in the SCAG Connect SoCal landing page at https://scag.ca.gov/connect-socal and I remain confused as to why the layout on the left-hand side of the page and the public comment are muddled by SCAG.</p> <p>1) why is there no description of the two separate processes at the root landing page for Connect SoCal; instead it only shows the links to the 'Draft Plan' comment page and process? This is confusing and potentially misleading for public comment.</p>	<p>Comment noted. We apologize for any confusion on the distinct commenting processes. By including the PEIR link on this page, our intent was to provide connection between the two processes. Please note that many of our communications during the draft period, including emails, newsletters and announcements at our board and committee meetings discussed the two concurrent comment periods. We balance requirements for the PEIR comment period with limitations in the layout of website, and will keep this in mind for future cycles.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-11 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001676.02	<p>2) The Connect SoCal 2024 Plan is not on OPR's CEQANET project description – why not?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-11 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001676.03	<p>3) Are the Plan documents, public comments, public hearing comments for the Connect SoCal 2024 plan part of the administrative legal record for the Connect SoCal 2024 PEIR process?</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-11 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
Submitted by	Riverside Neighbors Opposing Warehouses	Submittal 0001696
0001696.01	<p>Good morning. My name is Michael McCarthy. I'm with Riverside Neighbors Opposing Warehouses.</p> <p>There are a lot of good policies in this plan. But there's one unmentioned policy that undermines most of the good things in this plan.</p> <p>The goals of mobility, environment, communities are all noble and useful policy priorities, and the</p>	<p>Comment noted. The Goods Movement Technical Report provides an overview of global, regional/local, and national supply chain information with an emphasis on its economic contributions and impacts for the SCAG region goods movement system and supporting facilities. There is a direct correlation with population/employment/household growth and consumption of goods and services and as such, it is a fundamental driver for all freight-related activities across the region, the state, and the U.S.</p>

Unfortunately, this plan is undermined by the goods movement, exceptionalism that allows it to not have anything that would restrict its growth. Goods movement gets the "business as usual" treatment, leaving office retail and residents to shoulder the costs and burdens of reducing vehicle miles traveled.

Environment... Our poor air quality is 50% the fault of goods movement. 70% of inhalation cancer risk is caused by goods movement. 30% of greenhouse gases are from goods movement.

Mobility...goods movement causes congestion through single occupancy vehicles, low density land use. It does more damage to rail and road, and our rail, and our freight rail competes with passenger rail.

Communities...Goods movement breaks apart communities, causes low density. Industrial sprawl is dangerous for multimodal transit options like walking and biking, and it creates loads of low-quality, low-density jobs in communities of color.

Connect SoCal 2024 plans for goods movement, heavy duty, VMT, to grow at 4 times the rate of population growth, using your very optimistic demographic projections which are inconsistent with California Department of Finance and Caltrans social economic projections.

SCAG has chosen not to address logistics sprawl, as 95% of warehouses are being built in the Inland Empire.

Connect SoCal 2024 delays attainment of air quality standards by putting more trucks on the road.

Connect SoCal 2024 continues a regional policy of environmental injustice, disproportionately harming communities through goods movement, infrastructure adjacent to homes, schools, and parks.

Now, SCAG is a partner agency with AQMD, CARB, EPA, local municipalities and fixing these problems.

AQMD, CARB and EPA are in charge of making facilities and vehicles emit less pollution coming out the tailpipe. They control emissions control technology policies, and they're doing their best.

SCAG, along with local land use agencies, has a responsibility of deciding how many vehicles go on the roads.

The Connect SoCal 2024 plan needs to reduce logistics sprawl.

95% of warehouse bases being built in the Inland Empire leading to higher truck VMT.

This plan needs to apply the same policies that it does for passenger VMT as it does with truck VMT.

It needs to pursue a policy of industrial infill for warehouse development in coastal counties, reducing truck VMT and reducing congestion impacts, reducing impacts on the road.

Lastly, aim to keep truck VMT growth no fashion (faster?), the rate of population growth. Anything less will delay attainment of the air quality standards, delay attainment of our greenhouse gas emission targets and harm our communities.

The Goods Movement Technical Report discusses the region's clean transportation technology efforts, including SCAG's Last Mile Freight Program and Zero Emission Truck Infrastructure Study.

Connect SoCal acknowledges that work needs to be done to support an equitable transition to a user fee system. SCAG's key guiding principles for financial strategies includes establishing a user-based system that better reflects the true cost of transportation, provides firewall protection for new and existing transportation funds, and ensures an equitable distribution of costs and benefits. This could include exploring issues like vehicle weight.

Connect SoCal incorporates findings from SCAG's Integrated Passenger and Freight Rail Forecast that identifies investments that benefit passenger rail and support dramatic increases in service levels envisioned within Metrolink SCORE.

SCAG continues to work with cities and local communities to balance economic opportunities including workforce development as well as to address impacts from freight activities. The Goods Movement Communities Opportunities Assessment is the most recent study effort and SCAG will continue to engage communities throughout its upcoming Comprehensive Sustainable Freight Plan.

Connect SoCal meets all federal transportation conformity requirements, as discussed in the Transportation Conformity Analysis Technical Report.

The Goods Movement Technical Report acknowledges that impacted communities, particularly those near transportation corridors and distribution centers, often bear the disproportionate burden of poor air quality and its associated health risks. This disparity underscores the importance of addressing the equity implications of goods movement and ensuring that informed measures are taken to protect the health and well-being of vulnerable communities.

See response to comment 1822.10.1 in regard to logistics sprawl and truck VMT.

Thank you for your attention to this matter and have a great day.

Submitted by	Riverside Neighbors Opposing Warehouses	Submittal	0001822
0001822.01	<p>[13-1]</p> <p>Thank you for the opportunity to provide comments on the SCAG Connect SoCal 2024 Programmatic Environmental Impact Report (PEIR) (the Project). The Project lays out a vision for regional transportation, land-use priorities, and goods movement over the next 25 years for the six SCAG counties based on a theory of 'goods movement exceptionalism' where freight movement is exempted from the policies that apply to passenger vehicles, residential housing, and transit.</p> <p>I am writing this letter as a community member and environmental consultant. I am a member of Riverside Neighbors Opposing Warehouses (R-NOW), a community-based organization opposing a 4.7 million square foot warehouse project adjacent to three neighborhoods in the City of Riverside; surrounding homes with warehouses and warehouses with homes is bad land-use planning. Professionally, I have more than 20 years of experience examining near-road air pollution gradients, hazardous air pollutants, and performing health-risk assessments. I've written more than a dozen peer-reviewed articles funded by the U.S EPA, U.S. FHWA, MPOs and DOTs examining pollution from mobile sources.</p>		<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.02	<p>[13-2]</p> <p>The most cost-effective, technology-free way to reduce air quality and GHG emissions is to reduce the growth of the logistics sector along with your local partner agencies. Unfortunately, SCAG does not consider this as an option. SCAG pursues a business-as-usual approach to the goods movement industry providing zero policies that impact the emissions demand in this most important industrial sector.</p>		<p>Comment noted. As SCAG is not an implementing agency with no land use authority, decisions about land use and growth, including what type of warehouse gets built and where, rests fundamentally with each local government. SCAG works with local jurisdictions to develop policies that support the goals in approved planning documents, like the RTP/SCS. There are also many variables outside of the control of the region, state, and United States that impact where industrial development occurs and how freight flows are facilitated including and not limited to key regional impacts such as land development cost considerations and local consumption activities. Production and consumption of goods and associated complexities of the global supply chain generate challenging issues and concerns important to Southern California and SCAG will continue to focus on clarifying these issues and developing strategic initiatives through the Comprehensive Sustainable Freight Plan.</p> <p>SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.03	<p>[13-2 contd]</p> <p>The movement of freight (i.e., goods movement) impacts each of the non-economic policy goals of Connect SoCal 2024 negatively.</p> <p>1. Air Quality - Goods movement is the most important contributor to Southern California's air quality issues.</p> <p>a. Criteria pollutant exceedances</p> <p>i. Ozone – nation's worst (Extreme nonattainment) with over 100 exceedances of the NAAQS annually – more than 50% of the problem is due to goods movement emissions.</p> <p>ii. PM2.5 – Severe nonattainment – direct and indirect contributions to regional PM2.5</p> <p>iii. NO2 – state nonattainment along SR-60 purely due to high truck traffic from Diamond Bar through Jurupa Valley.</p> <p>b. Ambient inhalation cancer risk – over 60% of total cancer risk from breathing ambient air is due to exposure to diesel particulate matter from goods movement trucks, locomotives, ocean-going vessels, cargo-handling equipment, and construction equipment for these same industries.</p>	<p>Comment noted. Production and consumption of goods and associated complexities of the global supply chain generate challenging issues and concerns important to Southern California and SCAG will continue to focus on clarifying these issues and developing strategic initiatives through the Comprehensive Sustainable Freight Plan.</p> <p>SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p> <p>A reference discussing regional air quality challenges, including those from transportation, especially the goods movement sector, and related significant air quality impacts is included in Chapter 2, Our Region Today, of the Connect SoCal 2024.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.04	<p>[13-2 contd]</p> <p>2. Housing – land use for goods movement is a nuisance to people and residential communities – warehouses, railyards, ports, and freeway infrastructure are obnoxious land-uses for residential homes, parks, schools. There is active competition for land with homes being demolished for goods movement uses despite the housing crisis.</p>	<p>Comment noted.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.05	<p>[13-2 contd]</p> <p>3. Environmental Justice – The Goods Movement facilities are largely placed in lower socioeconomic neighborhoods with lower land prices among communities of color – overriding the objections of the communities living adjacent to them. Studies have shown that warehouses move into communities of color (i.e., follow socioeconomically disadvantaged communities) rather than communities of color moving in afterwards (Yuan, 2018, 2021).</p>	<p>Comment noted. The Goods Movement Technical Report includes Community and Environmental Justice as a core policy and implementation strategy, as well as context on SCAG's work in this area with respect to goods movement. Equity will continue to be an important focal point for the development of the Comprehensive Sustainable Freight Plan.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.06	<p>[13-2 contd]</p> <p>4. Transportation –</p> <p>a. Goods movement competes with people movement on the same transportation infrastructure, impinging on mobility goals. This is disproportionately happening in the Inland Empire where trucks and freight trains use a higher fraction of freeways and rail than passenger vehicles or commuter rail, respectively.</p> <p>b. Goods movement does more damage to infrastructure – heavier vehicles do exponentially more damage to roads and do not pay their fair share to upkeep. This requires higher operations and maintenance costs – again disproportionately impacting the Inland Empire.</p> <p>c. Congestion – goods movement facilities are sprawling farther and farther from the ports. Longer truck trips result in higher emissions, more congestion, and more GHGs.</p>	<p>Comment noted. SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward, as well as refining our data and analysis of truck routes and truck travel patterns, and impacts such as on pavement.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.07	<p>[13-2 contd]</p> <p>5. Greenhouse gas emissions - Goods movement vehicles are responsible for ~25% of GHG emissions from transportation in SoCal.</p>	<p>Comment noted.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.08	<p>[13-2 contd]</p> <p>6. Goods movement land-use is incompatible with compact development.</p> <ul style="list-style-type: none"> i. Non-walkable cities ii. Low-density, low-jobs warehouses iii. Can't use alternate modes of transportation for intra-regional goods movement and drayage – requires freeways; only inter-regional goods movement uses rail. iv. Warehouses literally demolishing homes in the Inland Empire to make room. 	<p>Comment noted.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.09	<p>[13-2 contd]</p> <p>7. Goods movement (warehousing) is engaging in a pattern of leapfrog development and logistics sprawl – destroying habitat, severing connectivity, and discouraging compact development.</p>	<p>Comment noted. As SCAG is not an implementing agency with no land use authority, decisions about land use and growth, including what type of warehouse gets built and where, rests fundamentally with each local government. SCAG works with local jurisdictions to develop policies that support the goals in approved planning documents, like the RTP/SCS. There are also many variables outside of the control of the region, state, and United States that impact where industrial development occurs and how freight flows are facilitated including and not limited to key regional impacts such as land development cost considerations and local consumption activities. Production and consumption of goods and associated complexities of the global supply chain generate challenging issues and concerns important to Southern California and SCAG will continue to focus on clarifying these issues and developing strategic initiatives through the Comprehensive Sustainable Freight Plan.</p> <p>SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.10.1	<p>[13-2 contd]</p> <p>I ask that SCAG consider applying the policies it applies to other sectors of passenger VMT and residential growth to Goods movement to mitigate the impacts of 'logistics sprawl'.</p> <ul style="list-style-type: none"> • Please consider alternative policies that aim to reduce heavy-duty truck VMT or at least limit truck VMT growth to the rate of population growth. 	<p>Comment noted. As SCAG is not an implementing agency with no land use authority, decisions about land use and growth, including what type of warehouse gets built and where, rests fundamentally with each local government. SCAG works with local jurisdictions to develop policies that support the goals in approved planning documents, like the RTP/SCS. There are also many variables outside of the control of the region, state, and United States that impact where industrial development occurs and how freight flows are facilitated including and not limited to key regional impacts such as land development cost considerations and local consumption activities. Production and consumption of goods and associated complexities of the global supply chain generate challenging issues and concerns important to Southern California and SCAG will continue to focus on clarifying these issues and developing strategic initiatives through the Comprehensive Sustainable Freight Plan.</p> <p>SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.10.2	<ul style="list-style-type: none"> Consider policies promoting industrial infill development in coastal counties. Logistics sprawl is pushing warehouse growth ever-further from the ports. This increases truck VMT, pollution, GHG emissions, and congestion on roads. The solution is promoting and subsidizing industrial infill and vertical warehousing nearer the ports. 	<p>Comment noted. As SCAG is not an implementing agency with no land use authority, decisions about land use and growth, including what type of warehouse gets built and where, rests fundamentally with each local government. SCAG works with local jurisdictions to develop policies that support the goals in approved planning documents, like the RTP/SCS. There are also many variables outside of the control of the region, state, and United States that impact where industrial development occurs and how freight flows are facilitated including and not limited to key regional impacts such as land development cost considerations and local consumption activities. Production and consumption of goods and associated complexities of the global supply chain generate challenging issues and concerns important to Southern California and SCAG will continue to focus on clarifying these issues and developing strategic initiatives through the Comprehensive Sustainable Freight Plan.</p> <p>SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.10.3	<ul style="list-style-type: none"> Promote environmental justice in equitable distribution of the negative externalities of goods movement – 95% of current planned warehouse footprint in the SCAG planning area are in the Inland Empire. Aim for policies of industrial infill with a target 50% of new warehouse (or infill warehouse) development to occur in coastal counties. 	<p>Comment noted. As SCAG is not an implementing agency with no land use authority, decisions about land use and growth, including what type of warehouse gets built and where, rests fundamentally with each local government. SCAG works with local jurisdictions to develop policies that support the goals in approved planning documents, like the RTP/SCS. There are also many variables outside of the control of the region, state, and United States that impact where industrial development occurs and how freight flows are facilitated including and not limited to key regional impacts such as land development cost considerations and local consumption activities. Production and consumption of goods and associated complexities of the global supply chain generate challenging issues and concerns important to Southern California and SCAG will continue to focus on clarifying these issues and developing strategic initiatives through the Comprehensive Sustainable Freight Plan.</p> <p>SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.10.4	<ul style="list-style-type: none"> Promote compact development and 'smart growth' to the Goods movement industry to combat endless logistics sprawl. 	<p>Comment noted. As SCAG is not an implementing agency with no land use authority, decisions about land use and growth, including what type of warehouse gets built and where, rests fundamentally with each local government. SCAG works with local jurisdictions to develop policies that support the goals in approved planning documents, like the RTP/SCS. There are also many variables outside of the control of the region, state, and United States that impact where industrial development occurs and how freight flows are facilitated including and not limited to key regional impacts such as land development cost considerations and local consumption activities. Production and consumption of goods and associated complexities of the global supply chain generate challenging issues and concerns important to Southern California and SCAG will continue to focus on clarifying these issues and developing strategic initiatives through the Comprehensive Sustainable Freight Plan.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.10.5	<ul style="list-style-type: none"> Prioritize people movement over goods movement – prioritize passenger rail over freight movement and passenger vehicles over freight vehicles. 	<p>Comment noted. Connect SoCal plans for the movement of people as well as goods, as both are needed for the region to thrive. The Plan attempts to balance competing priorities to meet the needs of the region. With respect to planning for people, Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region. The Mobility Technical Report details strategies (e.g., dedicated bus lanes, mobility hubs, first/last mile connections, etc.) and investments (e.g., Metrolink's SCORE Program, California High Speed Rail, etc.) that support growth towards this transportation vision.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.11	<p>[13-2 contd]</p> <p>In this letter, my comments will be on the implications that result from SCAG's unnamed policy of 'goods movement exceptionalism'. My comments in this letter rely on the following datasets and sources of information.</p> <ul style="list-style-type: none"> Connect SoCal 2024 PEIR Connect SoCal 2024 Appendix B – Air Quality and Health Risk Assessment Connect SoCal 2024 Technical Reports <ul style="list-style-type: none"> Aviation and Airport Ground Access Equity Analysis Goods Movement SCAQMD Air Quality Management Plan (2022) - http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan Warehouse CITY open data product - https://radicalresearch.shinyapps.io/WarehouseCITY/ Caltrans Traffic Census – Truck Traffic - https://dot.ca.gov/programs/traffic-operations/census and geospatial data - https://gisdata-caltrans.opendata.arcgis.com/datasets/c079bdd6a2c54aec84b6b2f7d6570f6d_0/about Region in Crisis – The Rationale for a Public Health State of Emergency in the Inland Empire (2023) – CCAEJ, Sierra Club - San Geronio Chapter– Robert Redford Conservancy - https://www.ccae.org/regionincrisis Multiple academic citations 	<p>Comment noted.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.12	<p data-bbox="205 94 569 147">[13-3] Role of SCAG and Local Governments</p> <p data-bbox="205 180 1123 375">Goods movement is a low-density, high-vehicle miles travelled (VMT) industry with negative externalities on aesthetics, air quality, biological resources, greenhouse gases, land use and planning, noise, population and housing, and transportation. It provides a variety of jobs, although the quality and payscale are highly inequitably distributed spatially throughout the region. However, there are also significant economic costs associated with the subsidized public infrastructure used by Goods movement that must be operated and maintained by local, state, and federal agencies.</p> <p data-bbox="205 378 1123 545">Connect SoCal 2024 is an RTP/SCS plan. As part of that plan, it must consider how to meet various regulatory requirements as a partner in managing regional air quality with its partner agencies. The roles of multiple agencies are either in the space of Emissions Control Technology or Emissions Demand Management. Emissions control technology reduces pollution from individual sources. Emissions demand management regulates the magnitude of activity (e.g., truck VMT or locomotive brake horsepower per hour).</p> <p data-bbox="205 578 1123 686">There are two pieces to every emissions inventory. 1. Cleaner technology – emits lower rates of polluter per unit. 2. Emissions activity – lower the number of units emitting pollution through emissions demand management.</p> <p data-bbox="205 719 1123 849">Connect SoCal 2024 is negligent in its consideration of emissions demand management for reducing emissions of pollution in our region. Due to the severity of the problems our region is facing, we request that the report be revised to highlight these deficiencies and describe why no emissions demand management measures are considered for the largest contributing sector to air pollution and environmental justice issues.</p>	<p data-bbox="1136 94 2060 203">SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p> <p data-bbox="1136 235 2060 347">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001822.13	<p>[13-3 contd] The 2022 AQMP from the SCAQMD describes the role of the Goods movement industry in its introductory section on p. 1-5.</p> <p>Goods movement is a substantial source of smog-forming emissions in our region and the goods movement sector has recently experienced substantial growth in the region. Projections indicate that this expansion will continue. This growth has resulted in surging demand for warehousing, which has fueled the construction of new warehouses in the Inland Empire. Due to the substantial emissions associated with warehouses, it is critical that land use decisions regarding the siting of warehouses consider air quality impacts when approving new projects. While these decisions are typically made at the local level and South Coast AQMD lacks direct regulatory authority over land use, South Coast AQMD recognizes that collaboration across multiple public agencies and cities is required to promote better land use planning in consideration of air quality impacts. Figure 1-1 provides a summary of the agencies responsible for controlling growth rates and emissions standards. While South Coast AQMD is responsible for both, we are not the primary agency for demand management.</p> <p>[See Figure 1-1 in attachment] Figure 1-1. Illustration of local, state, and federal agencies and their authority over emissions control technology or emissions demand management within the South Coast Air Basin. (AQMP, 2022; reproduced from comment letter 89 – McCarthy and Phillips).</p> <p>Air quality agencies are responsible for emissions control technology measures to reduce emissions from pollution sources – in the SCAG region that is the U.S. EPA, California Air Resources Board and the local air quality agencies (South Coast Air Quality Management District [AQMD], Mojave Desert AQMD, Imperial AQMD, and Ventura County Air Pollution Control District). These agencies responsible for emissions control technology have adopted many policies to reduce the impacts of emissions from goods movement emissions at the ‘tailpipe’ for trucks, cargo-handling equipment, locomotives, ocean-going vessels, and cargo aircraft. Future regulations from these agencies will continue to make new trucks, locomotives, and cargo-handling equipment cleaner through engine standards and active replacement with zero-emissions technology through 2045.</p> <p>Within the SCAG planning area, emissions control technologies are actively undermined by increases in the emissions activity that SCAG and its member agencies control. Emissions activity from trucks, cargo-handling equipment, trains, planes, and ocean-going vessels involved in goods movement emissions is growing at a rate 3-5 times population growth over the last decade. In other words, truck VMT is growing at a rate of 4 time population growth or passenger vehicle VMT. Emissions activity growing faster than the rate of population is a detriment to achieving National Ambient Air Quality Standards and is an abdication of the emission demand management authority of SCAG and its member agencies. Goods movement is being treated in a business-as-usual fashion, with no emissions management policies applied to it. This will delay attainment of the NAAQS by multiple years relative to alternative policy options of managing goods movement to grow at rates no faster than population growth.</p> <p>For passenger vehicle VMT, this role of SCAG and local governments is recognized, and the rate of passenger vehicle VMT is projected to decline as shown in Table 3.8-12 in the PEIR. In contrast, heavy-duty truck VMT increases by 43% over the SCAG planning period – a factor of four greater than projected population growth of 11% (SCAG projections) and infinitely faster than population growth if population declines (see accompanying letter on demographics).</p>	<p>Comment noted. As SCAG is not an implementing agency with no land use authority, decisions about land use and growth, including what type of warehouse gets built and where, rests fundamentally with each local government. SCAG works with local jurisdictions to develop policies that support the goals in approved planning documents, like the RTP/SCS. There are also many variables outside of the control of the region, state, and United States that impact where industrial development occurs and how freight flows are facilitated including and not limited to key regional impacts such as land development cost considerations and local consumption activities. Production and consumption of goods and associated complexities of the global supply chain generate challenging issues and concerns important to Southern California and SCAG will continue to focus on clarifying these issues and developing strategic initiatives through the Comprehensive Sustainable Freight Plan.</p> <p>SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.14	<p data-bbox="205 94 359 147">[13-4] Logistics Sprawl</p> <p data-bbox="205 180 1115 431">The term 'logistics sprawl' was coined to describe the phenomenon of the movement of logistics facilities away from urban centers (Dablanc et al., 2014; Dablanc and Ross, 2012). This phenomenon was found to be most extensive in Southern California using zip code level data from 1998 through 2009, showing a deconcentration of warehouses from the urban core (Los Angeles) towards the suburban and agricultural Inland Empire. This trend has only accelerated in the last 20 years – data from the Warehouse CITY open data product v1.17 shows that (1) over 90% of warehouse square footage developed since 2010 has been in the Inland Empire counties and (2) the barycenter of warehouse location continues to shift further from the San Pedro Bay Port complex over time.</p> <p data-bbox="205 464 1115 626">Figure 1 shows the size weighted average location of warehouses in Southern California by decade. In 1980, the average warehouse was in Los Angeles County in relatively close proximity to the ports and the population centers of Southern California. In the current decade, the average warehouse being planned/approved and built is just east of the City of Riverside – well to the east of the highly populated coastal counties and more than 65 miles from the Ports of Los Angeles and Long Beach.</p> <p data-bbox="205 659 1115 773">[See Figure 1 in attachment] Figure 1. Size-weighted average warehouse location and relative warehouse size by decade. Warehouse locations are growing and being sited further from the ports in a pattern of unmitigated logistics sprawl.</p> <p data-bbox="205 805 1115 967">Figure 2 shows the cumulative footprint of warehouses in the four most populated Southern California counties by decade. Patterns of growth in recent decades are almost exclusively in the Inland Empire. In the current decade, a huge influx of warehouses are being built in Riverside County through mega-warehouse complex projects like the World Logistics Center, Stoneridge Commerce Center, West Campus Upper Plateau, Beaumont Pointe, Serrano Complex, Legacy Highland Phase II project, and Sunset Crossroads.</p> <p data-bbox="205 1000 1115 1109">[See Figure 2 in attachment] Figure 2. Cumulative footprint of warehouses (and parking lots, trailers, dock doors) by county and decade in the highly populated SCAG counties. More than 95% of warehouse growth since 2010 occurred or is planned for Inland Empire counties.</p>	<p data-bbox="1136 94 1297 115">Comment noted.</p> <p data-bbox="1136 155 2053 264">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.15	<p>[13-4 contd] [Logistics Sprawl contd]</p> <p>The data is clear. Warehouses are getting larger, farther from the ports, and more likely to be located in the Inland Empire. The ring of warehouse growth now extends as far south as Menifee, as far east as Beaumont, and as far north as high desert cities (Palmdale, Lancaster, Victorville, Hesperia, Apple Valley, and Adelanto), or Bakersfield¹. There is almost no 'compact development' or 'smart growth' or 'industrial infill'. SCAG has not considered a single strategy to stop the leapfrog pattern of warehouse development that leads to longer truck trips, more congestion, more road damage, and more pollution. Stopping logistics sprawl should be a key requirement for additional warehouse development. Requiring or subsidizing vertical warehouses (multistory) and infill industrial development in coastal areas is needed to reduce the environmental impacts and distribute the externalities equitably. Instead of any mitigation, the SCAG Connect SoCal report allows business-as-usual to continue, with 95% of growth to occur in the already disproportionately impacted inland counties.</p> <p>Figure 3 shows the relative annualized activity growth rates for goods movement sectors from 2018-2037 relative to car VMT, population, and GDP projections based on the 2022 AQMP – based on SCAG Connect SoCal 2020 estimates; values for the 2024 emissions activity growth rates are not substantially different. The emissions activity growth rate for goods movement sectors are 3x to 5x times the rate of population growth; this is unsustainable and undermines attainment of the ozone standard, AB32 GHG goals, and addressing environment justice issues.</p> <p>Figure 3. Growth in emissions activity rate by selected emissions sectors based on AQMP footnotes in Chapter 3 of the 2022 AQMP. Annualized values are calculated by dividing cumulative growth from 2018-2037 by 20. Data obtained from AQMP 2022 Appendix III.</p>	<p>Comment noted. As SCAG is not an implementing agency with no land use authority, decisions about land use and growth, including what type of warehouse gets built and where, rests fundamentally with each local government. SCAG works with local jurisdictions to develop policies that support the goals in approved planning documents, like the RTP/SCS. There are also many variables outside of the control of the region, state, and United States that impact where industrial development occurs and how freight flows are facilitated including and not limited to key regional impacts such as land development cost considerations and local consumption activities. Production and consumption of goods and associated complexities of the global supply chain generate challenging issues and concerns important to Southern California and SCAG will continue to focus on clarifying these issues and developing strategic initiatives through the Comprehensive Sustainable Freight Plan.</p> <p>SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001822.16	<p>[13.5] Air Quality</p> <p>Southern California has the worst ozone air quality in the United States. Goods movement is the majority contributor to the emissions of the oxides of nitrogen (NOx) that are the limiting precursor for ozone creation. Off-road equipment, heavy-duty trucks, locomotives, and ocean-going vessels are responsible for more than 50% of NOx emissions in the South Coast air basin. In addition, trucks cause the state nonattainment for NO2 along SR-60 from Diamond Bar through Jurupa Valley. Lastly, inhalation cancer risk is above 200-in-a-million for almost every resident in the South Coast Air Basin as due to diesel particulate, responsible for more than 50% of all ambient inhalation cancer risk regionally.</p> <p>In each of these cases, the push for zero-emissions vehicles will improve the air quality in the air basin over the next 20 years. However, in the interim, the SCAG plan will increase the activity of each of these sectors emissions activity – more cargo handling equipment, more trucks, more locomotives, more (or larger) ocean-going vessels. Each of these categories will get cleaner through the actions of SCAG partner agencies at SCAQMD, CARB, and the EPA. And SCAG will undermine the expected improvement by allowing the activity of these emissions to grow at a business-as-usual rate.</p> <p>This delays attainment of the NAAQS for ozone and PM2.5. Goods Movement is the largest source and increasing truck VMT, locomotive engine activity, and cargo-handling equipment will undermine our air quality. This sector needs to shoulder its share of the burden and slow its growth until zero-emissions technology achieves significant market penetration (50%). In the interim, I think restricting the growth of this sector to the rate of population growth is a reasonable proposal to allow moderate growth in this sector while allowing technology fixes to our pollution to achieve significant market penetration.</p>	<p>Comment noted. Connect SoCal meets all federal transportation conformity requirements, as discussed in the Transportation Conformity Analysis Technical Report.</p> <p>As SCAG is not an implementing agency with no land use authority, decisions about land use and growth, including what type of warehouse gets built and where, rests fundamentally with each local government. SCAG works with local jurisdictions to develop policies that support the goals in approved planning documents, like the RTP/SCS. There are also many variables outside of the control of the region, state, and United States that impact where industrial development occurs and how freight flows are facilitated including and not limited to key regional impacts such as land development cost considerations and local consumption activities. Production and consumption of goods and associated complexities of the global supply chain generate challenging issues and concerns important to Southern California and SCAG will continue to focus on clarifying these issues and developing strategic initiatives through the Comprehensive Sustainable Freight Plan.</p> <p>SCAG has no authority to regulate or restrict freight growth. In contrast, SCAG manages the Last Mile Freight Program (LMFP) in partnership with the MSRC/AQMD that is converting fleets and independent owner operats to zero-emission and near-zero emission technologies and supporting infrastructure for commercial deployment of medium- and heavy-duty trucks operating in all four South Coast Air Basin counties. Additionally, SCAG supports many zero-emission related projects through numerous funding programs across local jurisdictions, member agencies, and regional partners to competitively bring as much state and federal dollars to the region to support these needed technology transitions.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.17.1	<p>[PEIR 13-6 to 13-28] Air Quality Errata</p> <p>This section contains specific technical issues with the PEIR for the Air Quality section and associated technical appendices and technical report.</p> <ul style="list-style-type: none"> • Section 3.3 – should be 3.3.1 - Definitions – these definitions are wildly incorrect in multiple instances. <ul style="list-style-type: none"> o P.3.3-1 – air dispersion is just one form of pollution transport – plumes and gravitational settling are others o P.3.3-1 – there are more units than just ppm and µg/m3 – e.g., ppb, ng/m3, ppt are all routinely used. o P.3.3-1 – please format pollutant subscripts properly throughout o P.3.3-2 – the primary source of ozone in SoCal is off-road equipment, followed by heavy-duty trucks, then ocean-going vessels. Passenger vehicles are fifth – see SCAQMD AQMP 2022 figure ES-2. o P.3.2-2 – please refer to the AQMP for descriptions of pollutants and associated health effects – the descriptions in this are woefully inadequate and misrepresentative of the current state of the science o P.3.2-3 – TACs – please include the clean air act defined hazardous air pollutants o P.3.3-3 – Why is the diesel exhaust section randomly referencing New England? The best and most exhaustive list of diesel studies are from Southern California. o P.3.3-4 and 3.3-10 – Incorrect NAAQS values for PM2.5 – you are referencing the old standard – current standard is 12.0 µg/m3 as shown in your own table 3.3-4. Please check throughout as multiple errors like this occurred. Using the 2006 standard is embarrassingly bad in a regulatory document. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001822.17.2	<ul style="list-style-type: none"> • Section 3.3.2 – Environmental Setting <ul style="list-style-type: none"> o P.3.3-5 – while the American Lung Association is a useful reference, EPA has the regulatory reference – the area is in extreme nonattainment for ozone as mentioned later on. o Table 3.3-2 – This is the rate of emergency department visits per 10,000 residents for asthma, not the actual rate of asthma. See: https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf o Map 3.3-1 – Why display 2015-17 when the base year is 2019 for this report? There is more recent model data available than 2017 for PM2.5 concentrations. o Map 3.3-2 – CalEnviroScreen4.0 used 2017-19 data – see its documentation. o P.3.3-12 – VOC, SOx, and NOx are not criteria pollutants. SO2 and NO2 are. o Table 3.3-7 – This table is mislabeled. NOx emissions from SCAQMD 2022 AQMP are 350 tons of NOx per day (Figure ES-2) for base year 2018. Please revise the title to accurately describe what you are showing or the numbers to accurately mirror the air district. o P.3.3-15 – These numbers for monitors are for regulatory monitors and ignore thousands of sensors and non-regulatory monitors. See, e.g., hundreds of PurpleAir monitors in the SCAG region and other types of monitors operated by citizen scientists, academics, and as special purpose monitors not shown in this figure. https://map.purpleair.com/ 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.17.3	<ul style="list-style-type: none"> • Section 3.3.3 Regulatory Framework <ul style="list-style-type: none"> o P. 3.3-21 – Conformity to the SIP means that transportation activities will ‘not delay timely attainment of the NAAQS’. SCAG’s inaction and policy of business-as-usual for goods movement will delay timely attainment of the NAAQS unless the magical black-box measures in the 2022 AQMP provide extremely effective controls. Do your part SCAG. o P. 3.3-26 - While reductions in Diesel PM and cancer risk have occurred, they are still well over the regulatory bright line of 100-in-a-million. Under a cumulative impact framework, emissions reductions that would accelerate declines in diesel PM are warranted that go beyond a merely technological control basis. Do your part SCAG. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.17.4	<ul style="list-style-type: none"> • Section 3.3.4 – Environmental Impacts <ul style="list-style-type: none"> o P.3.3-34 - Given the 20 year horizon for this PEIR and the conformity requirements, a threshold of significance should be added about 'delaying timely attainment of the NAAQS'. This project will delay timely attainment. o P.3.3-37 – In the construction example, no baseline 2019 year scenarios are included. Why was the baseline year omitted? o P.3.3-41 and throughout – Lumped VMT per capita declines, but this is not the correct metric for three reasons. <ul style="list-style-type: none"> ▪ First, the demographics are completely overestimated by ~15-20% as shown in the accompanying demographics letter. ▪ Second, the VMT is lumped to include passenger vehicle VMT and truck VMT in the same category. Heavy-duty truck VMT increases by 43% - passenger VMT goes down (~2%) and the lump sum goes down per capita, but not in aggregate. ▪ Third, the relative emissions for heavy-duty vehicles are much higher per vehicle, the aggregate emissions do not go down per capita as much as claimed, thus undermining timely attainment of the NAAQS and GHG targets. o Table 3.3-15 – SCAG provides the data for transportation planning for the SCAQMD Tables 3-2 and 3-4, thus this is a circular reference. o P.3.3-56 – SCAG can certainly estimate the number of ongoing construction projects – either via survey or research. Simply examining the number of construction workers would provide a baseline method for estimation. Asserting that it can't be done is false. 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

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0001822.18	<p>[13-29] P.3.3-61 – SCAG states Connect SoCal 2024 promotes increased transportation, physical activities, and 15-minute communities, but each of these policies is undermined by goods movement, warehouses encroaching on communities, and poor air quality caused by goods movement. Inconsistent.</p>	<p>Comment noted. As SCAG is not an implementing agency with no land use authority, decisions about land use and growth, including what type of warehouse gets built and where, rests fundamentally with each local government. SCAG works with local jurisdictions to develop policies that support the goals in approved planning documents, like the RTP/SCS. There are also many variables outside of the control of the region, state, and United States that impact where industrial development occurs and how freight flows are facilitated including and not limited to key regional impacts such as land development cost considerations and local consumption activities. Production and consumption of goods and associated complexities of the global supply chain generate challenging issues and concerns important to Southern California and SCAG will continue to focus on clarifying these issues and developing strategic initiatives through the Comprehensive Sustainable Freight Plan.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.19	<p>[13-30] Map 3.3-5 [Equity Analysis TR, Map 13] – There is no description of the methodology, time frame or quantitative values on the scale in this map. It is extremely difficult to interpret quantitatively what claims are being made. Is this due to AB 617 Community Emissions Reductions Programs? The text and this map are methodologically unintelligible. Is Less (brown) indicating improvement or is more (green) indicating improvement? Why are so few of the improved areas in the communities with the poorest air pollution (Inland Empire?)</p>	<p>Section 8.2.1 of the Equity Analysis Technical Report includes the methodology for the emissions impact analysis. Map 3.3-5 [Equity Analysis TR, Map 13] is updated to clarify the Plan impact is the change between the 2050 Baseline and 2050 Plan scenarios and that the scale on the map indicates values on a scale from “worsen” to “improve,” where brown indicates worsening (increasing) emissions and blue/green indicates improving (lower) emissions. Section 8.2.2 of the Equity Analysis Technical Report includes a demographic analysis comparing the region to Priority Equity Communities and to freeway-adjacent areas. SCAG explores changes to improve upon every iteration of the environmental justice analysis and can consider comparative analysis at the county level in future iterations of the Equity Analysis.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.20	<p>[PEIR 13-31 to 13-32]</p> <p>o P. 3.3-70 - This methodology is absurd - an arbitrary 1 mile long chunk of freeway is not the exposure scenario for any person in the entire basin. This is air quality dispersion modeling 101 - boundary conditions and multi-source emissions matter. This arbitrarily short boundary condition that excludes all truck arterials, all background concentrations, trucks that drive an average of 30 miles, and localized sources (intermodal facilities, rail, warehouses) is a severe underestimate of real-world conditions. Moreover, the methodology excluded all the mobile source air toxic gases - acetaldehyde, formaldehyde, benzene, 1,3-butadiene; rendering the underestimate of real-world risk at least 30% too low. This is multiple steps with biased low assumptions that underestimate true cancer risk.</p> <p>o Table 3.3-18 - The reported existing conditions (2019) maximum exposed individual residential cancer risk values are unvalidated values based on a limited spatial scope that does not provide an adequate indication of the actual exposures of individuals when compared to MATES V zip code average cancer risk model estimates. For example, the I-15 segment south of Temecula reports an existing Maximum EIR of 98.2, while the mean cancer risk for the zip code 92590 is 283 and for 92592 is 257 - both attribute ~72-73% of cancer risk from diesel PM. Thus, the average risk from diesel PM for all individuals in two zip codes is ~2x higher than modeled maximum value from AERMOD. This is due to ignoring background cancer risk. DPM is transportable and ubiquitous in the basin. Small segments of roadways are a subset of all possible sources within 50 km that can impact an individual. Because this exercise ignores the protocol for Air Toxics Modeling Guidance² from EPA that recommends modeling all sources within 50 km or including background, it fails to include most of the cumulative impact risk from diesel PM. This isn't isolated - 10 out of 12 SCAQMD zip codes had mean DPM risk higher than the predicted MAXIMUM risk from this inept modeling exercise. Please look at real-world DPM concentrations as measured by BC and EC concentrations at MATES V sites instead of publishing risk estimates that are - at minimum - a factor of 3 too low. See Table 1 below for comparisons. It is important to include reasonable boundary comparisons and include sources of emissions that are cumulative impacts, rather than this garbage exercise. Do your part SCAG.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.21	<p>[PEIR 13-33 to 13-46]</p> <p>Table 1. Comparison of PEIR AQ Table 3.3-18 MEIR risk value with population weighted zip code risks from MATES V. MEIR = maximum exposed individual receptor. MATES V values show the population weighted average diesel PM cancer risk for the zip code. In almost every comparison, the 'maximum' value from the SCAG analysis is lower than the average risk for the zip code. [See Table 1 in attachment]</p> <p>Table 3.3-19 – SCAQMD measures NO2 at two near-road sites and neither exceed 100 ppb. Please validate your model against real-world datasets.</p> <ul style="list-style-type: none"> • Table 3.3-20 – SCAQMD measures NO2 at two near-road sites and only the Ontario site exceeds 30 ppb; moreover, that is the highest measured concentration in the air basin. Please validate your model results. • P 3.3-75 – SCAG has statutory authority and responsibility to regulate on-road mobile emissions and yet this whole PEIR is a giant technocratic excuse on why it refuses to curtail diesel PM emissions using its authority through emissions demand strategy. Do your part SCAG. • P. 3.3-76 – Sensitive land use is not defined and is used in multiple manners in this section. Please define what a 'sensitive land use' is in the PMM-AQ-2 definition so the mitigation measure can be evaluated. <p>Greenhouse Gas Emissions</p> <p>The Goods Movement sections of this PEIR omit or are negligent in their consideration of the growth rate of goods movement sector GHG emissions activity. The only solutions proposed are technological. None focus on tried-and-true emission demand management measures such as infill development, reduced truck VMT, or efficiency measures. Instead, logistics sprawl and leapfrog development are the policy that SCAG pursues.</p> <ul style="list-style-type: none"> • Table 3.8-1 – Global warming potentials from IPCC AR6 released in 2021 should be used. • P. 3.8-11 - Urban heat island and extreme heat days are not given sufficient coverage, especially given the extreme temperatures in San Bernardino, Riverside, and Imperial counties. Please consider adding urban heat-island calculations or discussing CalEPA's work on this issue - https://calepa.ca.gov/climate/urban-heat-island-index-for-california/ • Table 3.3-7 - Goods Movement Exceptionalism on full display - rail and ocean-going vessels omitted from emissions inventory as if they aren't invited into the basin via port, goods movement policies, and warehouse land-use policies. SCAG do your part. • Table 3.3-8 - estimates of CO2 from rail are available from CARB GHG emission inventory tool and should be included and projected forward as part of RTP analysis; rail is a significant GHG contributor nationally and locally, especially for projected goods movement emissions growth. • Table 3.8-12 – This is ridiculous. VMT per capita details need to be provided for Trucks (heavy duty VMT). See Table 2 for the proper accounting of VMT that identifies the unrestrained growth and devotion of infrastructure to the trucking industry. SCAG's omission of emissions demand management control is anti-people and omits the greater emissions of truck GHGs per mile traveled (~2.4 lbs CO2 vs. ~0.8 lbs CO2), thus increasing GHG emissions over the intervening time period, despite the lower total VMT, because of the shifting fleet composition to trucks. <p>Table 2. Revised version of Table 3.8-12 to include tabulated breakout of Truck VMT to display the unrestrained growth in goods movement planned by SCAG from 2019-2050 as part of its own transportation planning. [See Table 2 in attachment]</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.22	<p>[13-40]</p> <p>[The Goods Movement sections of this PEIR omit or are negligent in their consideration of the growth rate of goods movement sector GHG emissions activity. The only solutions proposed are technological. None focus on tried-and-true emission demand management measures such as infill development, reduced truck VMT, or efficiency measures. Instead, logistics sprawl and leapfrog development are the policy that SCAG pursues.]</p> <ul style="list-style-type: none"> • P. 3.8-10 – All GHG strategies are technology based – none are emissions demand management based or land-use changes. This is insufficient and supportive of higher GHG emissions through the clear and recognized logistics sprawl throughout the SCAG region. Longer trip distances for freight results in higher GHGs, and there is no policy supporting industrial infill or reduced truck VMT per capita to reduce congestion, road maintenance, noise, and other negative externalities of goods movement. 	<p>Comment noted. SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.23	<p>[13-42]</p> <p>[The Goods Movement sections of this PEIR omit or are negligent in their consideration of the growth rate of goods movement sector GHG emissions activity. The only solutions proposed are technological. None focus on tried-and-true emission demand management measures such as infill development, reduced truck VMT, or efficiency measures. Instead, logistics sprawl and leapfrog development are the policy that SCAG pursues.]</p> <ul style="list-style-type: none"> • P. 3.8-51 – The project plan clearly generates excessive GHG emission for the goods movement sector when analyzed in isolation and is thus inconsistent for this sector. Hiding those emissions among passenger VMT reductions is not reasonable. SCAG do your part. 	<p>Comment noted. SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.24	<p>[PEIR 13-47; Plan 13-47] Environmental Justice</p> <p>The Connect SoCal 2024 PEIR includes no specific section on Environmental Justice, despite the long-standing and widespread issues of environmental justice. This is problematic for multiple reasons.</p> <p>California state law 65040.12(e) defines the term environmental justice as ‘the fair treatment and meaningful involvement of all people regardless of race, color, culture, national origin, income, and educational levels with respect to the development, implementation, and enforcement of protective environmental laws, regulations, and policies.’</p> <p>The Connect SoCal 2024 PEIR does not reflect the meaningful involvement of communities disproportionately impacted by its impacts in the crafting of this project. Specifically, this PEIR omits any mention of the community activism and opposition to the land-use and transportation policies siting warehouses in Inland Empire communities as reflect in the January 2023 Region in Crisis report [3: https://www.ccae.org/regionincrisis] describing the impacts of goods movement facilities on our communities. I sent letters, participated in listening sessions, and public comment sessions and none of my concerns are reflected in this PEIR or Connect SoCal 2024 plan.</p> <p>There are multiple community-based organizations formed and organized in the last five years specifically to fight warehouse and goods movement projects in Southern California. I am part of Riverside Neighbors Opposing Warehouses (R-NOW). Others include the Pass Action Group in Banning, the South Fontana Concerned Citizens Coalition (SFCCC), Bloomington Concerned Citizens, The People’s Collective for Environmental Justice, San Bernardino Airport Communities, Just SB, and Lakes at Hemet West, Ontario for Agriculture. These are new additions to the longstanding opposition of groups like Sierra Club San Gorgonio Chapter – Moreno Valley Group and Centers for Community Action and Environmental Justice (CCA EJ); together these two groups successfully blocked warehouse projects in Moreno Valley in 2023 through litigation. These community groups are calling for a warehouse moratorium, warehouse setbacks such as proposed in AB 1000, and other measures to prevent warehouse encroachment on existing communities; not merely token engagement activities like SCAG pursues. SCAG’s Goods Movement Technical Report mentions partnerships with industry and big business on its page 1 – indicating the priority of its partners in developing this policy of goods movement exceptionalism.</p> <p>Connect SoCal 2024 is an example of a ‘Decide, Announce, Defend’ process with no actual community engagement with community groups on the ground fighting the policies that SCAG promotes. Diesel PM, ozone, and goods movement facilities are disproportionately located in Inland Empire communities of color. This PEIR does nothing to address that fundamental disparity. Community engagement was an empty ritual that had no impact on the final PEIR or its exemptions for Goods Movement activities. SCAG provides a ‘toolbox’ for environmental justice and a few empty words on how it engages in environmental justice while failing to actually take any meaningful actions or policies to reduce impacts as it has the regulatory power to do.</p>	<p>Comment noted. For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir.</p> <p>As part of the development of Connect SoCal 2024, the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or the Plan), SCAG conducted robust outreach and stakeholder engagement and provides a summary of outreach activities and findings in the Public Participation and Consultation Technical Report. Through the outreach efforts, SCAG gathered input from more than 3,600 residents across the region by conducting 20 in-person workshops and seven virtual workshops, hosting 20 pop-up and street team engagements, and partnering with 15 community-based organizations (CBOs). SCAG also employed digital and traditional advertising to direct residents and stakeholders to comment opportunities. Among the common themes in the feedback collected were concerns related to housing affordability, transportation safety, climate change and economic opportunities.</p> <p>Section 4.1 of the Equity Analysis Technical Report includes information about how staff incorporated feedback specific to the Equity Analysis from the public engagement process, including suggestions that could not be accommodated at the time of preparation, but would be considered in future analyses. Additionally, feedback received outside of the Plan public engagement process, like SCAG’s standing Equity Working Group, were also considered, and incorporated into the report where possible. For example, Figure 1 of the Equity Analysis Technical Report is visualized differently from when it was first presented in early iterations based on feedback received from a participant after attending the March 2023 Equity Working Group meeting where staff presented on the Equity Analysis approach.</p> <p>SCAG staff appreciate this list of community-based organizations advocating for changes related to goods movement issues and look forward to connecting with these groups in upcoming work. SCAG conducted community-based engagement through the Goods Movement Communities Opportunities Assessment study and will be furthering these efforts through the development of the Comprehensive Sustainable Freight Plan.</p> <p>As SCAG is not an implementing agency with no land use authority, decisions about land use and growth, including what type of warehouse gets built and where, rests fundamentally with each local government. SCAG works with local jurisdictions to develop policies that support the goals in approved planning documents, like the RTP/SCS.</p>

ID	COMMENT	RESPONSE
0001822.25	<p>[PEIR/Plan 13-47 contd] [Environmental Justice contd]</p> <p>Figure 4 shows the overlay of CalEnviroScreen4.0 scored quantiles with warehouses locations. There is a significant confluence between warehouse mega-clusters and disproportionately impacted communities.</p> <p>[See Figure 4 in attachment] Figure 4. Warehouse locations overlaid with areas of CalEnviroScreen4.0 disproportionately impacted areas.</p> <p>The purpose of CEQA is to (1) inform the public and decisionmakers of all potential environmental impacts of proposed discretionary projects and (2) to mitigate or eliminate significant environmental effects of public agency decisions. I do not believe that the draft PEIR can be considered a credible document when it entirely omits any discussion of environmental justice and the need to mitigate the cumulative environmental impacts of thousands of warehouses adjacent to vulnerable communities.</p> <p>Therefore, I ask SCAG to justify its omission of Environmental Justice concerns of the community regarding goods movement from this draft PEIR. In addition, I ask for an analysis of the impacts of the cumulative projects within the SCAG on these census tracts to be evaluated and disclosed to the public as part of the PEIR process. Finally, I ask that any project impacts that will disproportionately impact residents of SB 535 communities be involved in discussions around the most impactful mitigation measures that can be done to reduce the impacts of the encroaching warehouses and goods movement facilities on their communities.</p>	<p>The Equity Analysis Technical Report includes the statutorily required Environmental Justice analysis and is supplemented by additional analysis to elevate the importance of equity in Connect SoCal 2024.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir.</p>
0001822.26	<p>[PEIR/Plan 13-48] Alternatives Analysis</p> <p>There are two alternatives analyses that should be performed as part of the PEIR to meet CEQA requirements to inform the public and decisionmakers of all potential environmental impacts and to mitigate or eliminate significant environmental impacts of public agency decisions.</p> <p>1) Demographics Analysis – As described in the accompanying demographics letter, the demographic projects in the PEIR are extraordinarily optimistic and inconsistent with the declining population projects by other state agencies (California Department of Finance and Caltrans). It is important to do reasonable contingency planning for a stagnant and/or declining population future, even if it isn't considered most likely. Please perform a thorough alternatives analysis with either of those projections of population.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.27	<p>[PEIR/Plan 13-48 contd]</p> <p>2) Goods Movement Restricted to Population Growth – As described throughout, Goods Movement activity grows at 3-5X population growth under the optimistic population growth scenario. This appears to be a deliberate policy of exempting the Goods Movement from the emissions demand management policies applied to housing, passenger VMT, and mobility, and 15-minute city goals. Logistics Sprawl is inconsistent with this and yet no policies appear to be applied to Goods Movement. Therefore, I ask for an alternatives analysis that examined whether any significant and unavoidable impacts could be avoided by applying the policies of reducing VMT, infill development, and compact growth to the Goods Movement industry.</p>	<p>Comment noted. SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.28	<p data-bbox="191 87 304 115">[13-49]</p> <p data-bbox="191 120 304 147">Summary</p> <p data-bbox="191 168 1115 402">Connect SoCal 2024 is an extremely important planning document that sets the stage for nearly 750 billion dollars of transportation infrastructure. Unfortunately, this plan encourages the goods movement sector related emissions activity to grow by a factor of 3X and 6X greater than population growth. The goods movement sector emissions activity growth in Connect SoCal 2024 is an abdication of local regional and local municipality accountability for emissions-demand management. The SCAG is the relevant authority to choose to pursue and lead on a policy of emissions-demand management for the goods movement sector, along with its partner air quality agencies and the local municipalities that make land-use planning decisions.</p> <p data-bbox="191 423 1115 630">In conclusion, the most cost-effective, technology-free way to reduce emissions is to reduce the growth of the logistics sector along with your local-partner agencies. This requires a focus on local actions that can be taken by SCAG and collectively by local municipalities, and that requires SCAG leadership. The SCAG should provide leadership and coordination that will allow the region to limit exponential demand-driven growth that predominantly harms communities alongside goods movement corridors, and that will delay attainment of air quality standards for the entire region.</p> <p data-bbox="191 651 1115 716">Our communities deserve better and are paying the price and people are fleeing the state. Prioritize people over industry in agency planning.</p>	<p data-bbox="1121 87 2066 207">Comment noted. SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p> <p data-bbox="1121 228 2066 347">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.29	<p data-bbox="191 721 283 748">Errata</p> <p data-bbox="191 753 283 781">[13-50]</p> <ul data-bbox="191 786 1115 867" style="list-style-type: none"> • Map ES-4 [Main Book Map 2.7 Existing Land Use] – March ARB Boundaries reflect 1996 year active base boundaries and not post BRAC active base boundaries. The March JPA planning area is an industrial park for ~1800 acres of the displayed map. Please revise. 	<p data-bbox="1121 721 2066 954">Comment noted. The existing land use data found in Map ES-4 was developed by SCAG using 2019 tax assessor data as a basis, with further refinement and standardization conducted in-house. Data were reviewed by local jurisdictions during the Local Data Exchange process and all suggested revisions were made (no revisions were suggested by the County of Riverside, the local jurisdiction covering this area). These data do not seek to reflect jurisdictional or other planning area boundaries—existing land use data are provided as a tool for Connect SoCal development and are not an adopted part of Connect SoCal 2024. SCAG will continue to work with available data sources and local jurisdictions to ensure that land use data are as current as possible.</p> <p data-bbox="1121 976 2066 1094">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.30	<p data-bbox="191 1099 283 1127">[13-51]</p> <ul data-bbox="191 1131 1115 1273" style="list-style-type: none"> • Map ES-5 [Main Book Map 3.3 Forecasted Regional Development Patter] – The relative ratios of priority development areas by county are not consistent with the projected growth in absolute or relative population. It is unclear why San Bernardino and Riverside County has so few priority development areas (land area basis) relative to LA County or Orange County despite having far higher projected relative population growth. 	<p data-bbox="1121 1099 2066 1354">Priority Development Areas (PDAs) are areas within the region where future growth can be located in order to assist in achieving plan goals. Roughly 2/3 of the region's anticipated household growth by 2050 is expected to occur within PDAs, and roughly 1/3 outside of PDAs. With the exception of Spheres of Influence, which are considered a PDA, other PDAs are found less frequently in Riverside and San Bernardino counties due to generally lower levels of transit service, walkability, land use mixing, and other factors which comprise PDAs. These counties have even fewer instances of multiple overlapping PDAs, which is displayed on this map. More detail on PDA composition can be found in Section 5.2 of the Land Use & Communities Technical Report.</p> <p data-bbox="1121 1375 2066 1497">For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.31	<p>[13-52]</p> <ul style="list-style-type: none"> Map ES-6 [Main Book Map 3.4 Priority Development Areas] - Same basic comments for transit priority areas and neighborhood mobility areas - the fraction of the land-area in inland counties with these designations is proportionally lower than their expected growth rates and current population density. Is there spatial inequity in the allocation of these areas? Additionally, how are these priority areas affected if population growth rates are CA DoF Table P-2A instead of SCAG rose-colored glasses? 	<p>Priority Development Areas (PDAs) are areas within the region where future growth can be located in order to assist in achieving plan goals. Roughly 2/3 of the region's anticipated household growth by 2050 is expected to occur within PDAs, and roughly 1/3 outside of PDAs. With the exception of Spheres of Influence, which are considered a PDA, other PDAs are found less frequently in Riverside and San Bernardino counties due to generally lower levels of transit service, walkability, land use mixing, and other factors which comprise PDAs. These counties have even fewer instances of multiple overlapping PDAs, which is displayed on this map. More detail on PDA composition can be found in Section 5.2 of the Land Use & Communities Technical Report. PDA boundaries reflect infrastructure and built environment characteristics; for a discussion of population forecast differences see the response to comments 0001829.01, 0001829.02, and 0001829.03.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.32	<p>[PEIR 13-53]</p> <ul style="list-style-type: none"> P. ES-13 – botched citation 	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.33	<p>Table 5 – Please include SBD and RIV to identify truck counts due to their high cargo counts and cumulative pollution impacts.</p>	<p>Comment noted. Table 5 highlights estimated average daily auto and truck trips at six select commercial service airports in the SCAG region for illustrative purposes and is not intended to be comprehensive or exhaustive. Estimated airport truck trips for SBD and RIV are included in the SCAG regional surface transportation models in Connect SoCal 2024 for the base year (2019) and forecast horizon year (2050).</p>
0001822.34	<p>Figure 14 – SCAG has at least 30% more air cargo (and associated emissions, noise) than any other major metropolitan areas</p>	<p>Comment noted. Trucks trips associated with SCAG region air cargo activity are included in the SCAG regional surface transportation models and related analyses. Airport noise analysis, including air cargo carriers and ground support equipment, falls under the jurisdiction of the airports and the Federal Aviation Administration (FAA) Office of Noise. The South Coast Air Quality Management District (AQMD) and California Air Resources Board (CARB) monitor aircraft and airport emissions, including air cargo related emissions. Finally, the FAA includes Environmental Protection Agency (EPA) aircraft emissions as part of its aircraft certification and recertification program. The EPA sets the Emissions Standards and the FAA sets and administers the Certification Requirements for aircraft and engines to demonstrate compliance with the Emissions Standards.</p>
0001822.35	<p>Figure 20 – 300,000 tons of monthly air cargo – again, we are choosing to emit more pollution than any other region due to our overreliance on goods movement.</p>	<p>Comment noted. The SCAG regional surface transportation models factor in truck trips in their analyses. The South Coast Air Quality Management District (AQMD) and California Air Resources Board (CARB) monitor aircraft and airport emissions, including air cargo related emissions. Finally, the Federal Aviation Administration (FAA) includes Environmental Protection Agency (EPA) aircraft emissions as part of its aircraft certification and recertification program. The EPA sets the Emissions Standards and the FAA sets and administers the Certification Requirements for aircraft and engines to demonstrate compliance with the Emissions Standards.</p>
0001822.36	<p>Page 55 – Is AQMD also doing an MOU with SBD and other cargo airports?</p>	<p>Comment noted. At the time of the most recent South Coast AQMD commercial airport MOU process (2018 to 2019), San Bernardino International Airport (SBD) was not a commercial service airport (SBD resumed commercial service passenger flights in 2022). In 2019, the South Coast AQMD approved MOUs with Los Angeles International Airport, John Wayne Orange County Airport, Hollywood Burbank Airport, Ontario International Airport, and Long Beach Airport. Please see the South Coast AQMD Commercial Airports MOUs website for more information.</p>

ID	COMMENT	RESPONSE
0001822.37	Table 7 – Growth rates in truck trips to ONT and LAX are 5.6% and 2.6% per year – multiple times higher than population growth rate. Please include this in alternatives analysis emissions demand management.	Comment noted. The SCAG modeling team factors in growth in truck trips, including airport cargo trucks, in its regional surface transportation models for each Connect SoCal update and amendment. For Connect SoCal 2024, the regional surface transportation models included estimated airport truck trips for the model base year (2019) and forecast horizon year (2050). Each Connect SoCal amendment and update reflects changes to surface and airport ground transportation, including airport cargo truck trips and updated airport landside ground transportation projects. Please note that SCAG and other MPOs do not have regulatory, operational, or planning authority over the airports and their ground transportation projects. As stated in the Federal Aviation Advisory (FAA) Circular 150/5070-7 and the U.S. Government Accountability Office (GAO) report GAO-10-120, the regional airport planning carried out by MPOs should complement but not guide the planning done by the FAA and individual airports.
0001822.38	Overall – no analysis of noise for cargo airports (SBD, RIV, SCS) – goods movement exceptionalism again	Comment noted. Airport noise analysis, including RIV, SCS, and SBD, falls under the jurisdiction of the airports and the FAA Office of Noise. The select airport offices of noise and the FAA Office of Noise highlighted in the technical report are for illustrative and not comprehensive purposes.
0001822.39	<p>[Plan/PEIR 13-54]</p> <ul style="list-style-type: none"> • Land use section of PEIR <p>o P. 3.11-3 – The SCAG region serves as the nation’s gateway for global trade is a heckuva opener for a region with 19M people’s land-use priority. That shows the bias inherent in your whole PEIR.</p>	<p>Comment noted.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.40	<p>[Plan/PEIR 13-55]</p> <p>P. 3.11-7 – Compact development and smart growth are not applied to the goods movement industry? Why are they applied to residential growth but not warehouse growth?</p>	<p>Comment noted. Each local jurisdiction has a defined boundary of its area and has accordingly various approaches towards its land use development including residential uses. Goods movement production and manufacturing and their supporting supply chain distribution and fulfillment geographies that serve local consumption transcend global, national and statewide boundaries. Many variables involved in the process (land development, product materials sourcing, labor, etc.) are completely outside of the control of Southern California. Concerns of localized goods movement impacts are a high priority for SCAG and these challenges will continue to be assessed as part of the Comprehensive Sustainable Freight Plan.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.41	<p>[PEIR 13-56 to 13-58]</p> <p>o Map 3.11-1 – This map is grossly inaccurate and out-of-date.</p> <ul style="list-style-type: none"> ▪ Wrong base year – the base planning year is 2019 – not 2016. ▪ March JPA planning area is ~4400 acres of industrial and ~2,000 acres of military installation. ▪ This should show the 2019 land use designations which would be markedly different for Inland Empire communities due to the explosion in industrial warehousing land-uses between 2016 and 2019 (and subsequent years). • As an example, it shows a huge swath of agricultural land between Moreno Valley and Perris south of the March ARB where that is all Industrial warehouses – 50M square feet of them. • Same story for South Ontario which just finished construction of the South Ontario Logistics Center, a 4M SQ FT warehouse – largest in the country. ▪ Please revise this map to show 2019 general plan land use designations that are accurate. <p>• Population, Land Use, and Housing section of PEIR</p> <p>o Table 3.14-3 – OC household size in 2019 is not 1.29 – typo?</p> <p>o P 3.14-5 – EJ equity analysis should be in the PEIR as a full EJ section, not merely a technical report in the plan outside of CEQA.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.42	<p>[13-59] [Population, Land Use, and Housing section of PEIR contd] o Table 3.14-7 [PEIR p. 3.14-6] - Unemployment rates for the region need to be population weighted - SCAG regional unemployment rate is largely based on LA county. Please revise the table and text.</p>	<p>The SCAG region unemployment rate shown in Figure 8 of the Demographics & Growth Forecast Technical Report is the sum of the employed persons in the region's six counties divided by the sum of the labor force in the region's six counties, sourced from the state Employment Development Department's monthly labor force data series. Since LA county represents a majority of the region's employment, it is expected that the region-wide trend is closely linked to LA county's.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.43	<p>[13-60] [Population, Land Use, and Housing section of PEIR contd] o Table 3.14-8; 9; 10 – Population, Household, and Employment projections for the SCAG region are far higher than CA DoF or Caltrans projections for the same time period - largely driven by Los Angeles County. Please explain and include state agency projections as lower bound estimates.</p>	<p>See response to comments 0001829.01, 0001829.02, and 0001829.03.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.44	<p>[PEIR/Plan 13-61] [Population, Land Use, and Housing section of PEIR contd] o P.3.14-12 – The scoping plan discusses the 'legacy of transportation and land use decision making that has resulted in marginalization of low-income communities and communities of color...' This is ONGOING through Goods Movement Exceptionalism. SCAG needs to take a long hard look in the mirror.</p>	<p>Comment noted.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.45	<p>[PEIR/Plan 13-62] [Population, Land Use, and Housing section of PEIR contd] o P 3.14-12 – That the Appendix E of the scoping plan that is discussed for Sustainable and Equitable Communities only applies to 'residential and commercial development' is yet another example of the Goods Movement Exemption. Trucks don't have to cut their VMT just the peasants that live here.</p>	<p>Comment noted. Please refer to the Goods Movement Technical Report for information related to freight truck mode information.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.46	<p>[13-68] o Safety – a recently released report on truck safety indicates that fatalities associated with trucks has increased over the past five years (2017-2021) such that 13% of traffic fatalities involve a heavy truck, killing the occupants of the non-truck vehicle ~83% of the time. Fatalities increased from ~4,900 in 2017 to ~5,800 in 2021. [4 https://tripnet.org/wp-content/uploads/2023/12/TRIP_Freight_Report_December_2023.pdf] Increasing goods movement truck VMT will result in more fatalities in Southern California, a significant and unavoidable impact.</p>	<p>Comment noted. SCAG recognizes the importance of safety with respect to goods movement and it is discussed within the Goods Movement Technical Report. Additionally, SCAG will be performing an enhanced safety assessment as part of the Comprehensive Sustainable Freight Plan.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.47	<p>[PEIR/Plan 13-63] [Population, Land Use, and Housing section of PEIR contd] o P. 3.14-20 – The second threshold of significance 'displace substantial numbers of existing people or housing' is happening all over the Inland Empire. Dozens of warehouse projects are buying residential homes, demolishing them, and replacing them with the warehouse projects. Bloomington Business Park is actively demolishing 190 homes and an elementary school to replace them with 4 warehouses. The Airport Gateway Specific Plan proposed to demolish over 1,000 homes before the Attorney General stepped in along with many environmental justice communities. SCAG needs to stop endorsing rezoning residential for industrial throughout the Inland Empire in the midst of a housing crisis.</p>	<p>Comment noted. Section 5.2 of the Land Use and Communities Technical Report includes language noting that "Although the region will see benefits from infill development, communities are encouraged to actively acknowledge and plan for potential impacts including displacement." In addition, Regional Planning Policy 38 calls for "Prioritize communities that are vulnerable to displacement pressures by supporting community stabilization and increasing access to housing that meets the needs of the region."</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001822.48	<p>[PEIR/Plan 13-64] [Population, Land Use, and Housing section of PEIR contd] o P.3.14-26 – The displacement of residential for industrial is anecdotally significant in the Inland Empire and it is due to SCAG pushing goods movement.</p>	<p>Comment noted. As SCAG is not an implementing agency with no land use authority, decisions about land use and growth, including what type of warehouse gets built and where, rests fundamentally with each local government. SCAG works with local jurisdictions to develop policies that support the goals in approved planning documents, like the RTP/SCS. There are also many variables outside of the control of the region, state, and United States that impact where industrial development occurs and how freight flows are facilitated including and not limited to key regional impacts such as land development cost considerations and local consumption activities. Production and consumption of goods and associated complexities of the global supply chain generate challenging issues and concerns important to Southern California and SCAG will continue to focus on clarifying these issues and developing strategic initiatives through the Comprehensive Sustainable Freight Plan.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.49	<p>[13-65] o Map 3.14-2 [Demographics and Growth Forecast TR, Map 7] - The planned growth map is exceptionally inconsistent with the State agency projections of population decline for LA County. The population is projected to decline in LA county by over 2M residents compared to this plan. Please compare projections and address that SCAG's projections are very inconsistent with state planning agencies.</p>	<p>See response to comments 0001829.01, 0001829.02, and 0001829.03.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.50	<p>[13-66] o Map 3.14-3 [Demographics and Growth Forecast TR, Map 3] - Unincorporated county job growth appears to be excluded in this map. Please clarify that the title of jurisdiction only applies to cities and excludes JPAs, and census designated places with extensive projected job growth (e.g., MJPA planning area, Mead Valley, Bloomington, Fontana sphere of Influence, Temescal Canyon, Beaumont sphere of influence); This map is a drastic underestimate for inland counties with significant growth in unincorporated communities.</p>	<p>The existing map contains a note that county unincorporated areas are excluded to improve cartographic display. Transportation Analysis Zone (TAZ)-level growth in unincorporated areas such as CDPs and JPAs is more easily visible on Map 2, or in the webmap accompanying the Connect SoCal projections and Local Data Exchange (LDX) process.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001822.51	<p>[13-67] o Transportation – my estimates of the 43% growth in truck traffic while passenger vehicle declines would suggest that Inland Empire highways will have average truck traffic percentages of 16% in 2050, up from a current value of 11-12%. FHWA considers a major freight corridor any highway with greater than 8,500 trucks per day. Almost every freeway in the Inland Empire exceeds that number of trucks as an existing condition, and the plan decreases the relative ratio of passenger vehicles on those freeways only for trucks to replace them.</p>	<p>Comment noted. Please refer to the Goods Movement Technical Report for information related to freight truck volume and bottleneck information.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
Submitted by	Riverside Neighbors Opposing Warehouses	Submittal 0001823
0001823.01	<p>P.1 – no community engagement, no discussion of EJ communities, only discussions of partnerships with industry and government big money programs</p>	<p>Comment noted. The Goods Movement Technical Report includes Community and Environmental Justice as a core policy and implementation strategy, as well as context on SCAG's work in this area with respect to goods movement.</p>

ID	COMMENT	RESPONSE
0001823.02	P.2 – goods movement is essential but the proposed growth rates are unsustainable and contrary to the people living in these communities	<p>Comment noted. The predominance of freight related transportation activities in the region are driven by local consumption. The local consumption market directly from the Ports of Los Angeles, Long Beach, Hueneme, and San Diego includes Southern California, Central California, Arizona, New Mexico, Nevada, and Mexico for many intermediary product interchanges to finished goods.</p> <p>National freight flows will continue to be directly impacted by global issues and the cost to move freight. As witnessed the past decade, many variables outside of the control of the region will continue to have impacts. Regardless of where the future goods movement volume baseline may end up for Southern California, goods movement will continue to grow based on local consumption markets.</p>
0001823.03	P.4 – this section conflates goods movement as primarily serving local business and residents – the majority of goods movement is pass through to other parts of the country, not local.	Comment noted. This section discusses multiple supply chain linkages with respect to how goods are distributed both locally and outside of the region.
0001823.04	P. 7 – Figure of retail sales – what do national retail sales have to do with local goods movement growth rates? Please state your assertions and assumptions.	<p>The SCAG region being the largest population and consumption market in the nation has a very strong correlation with national retail sales trends. This includes impacts stemming from the COVID-19 pandemic including a substantial increase in consumption activity versus more recent inflationary drivers for retail sales trends.</p> <p>National data provides more granularity across categories, notably for digital e-commerce sales that are not reflected in local tax sales data. Further translation from national data is being developed to provide information at the MSA level as part of the Comprehensive Sustainable Freight Plan Update and will be incorporated into the next Connect SoCal update.</p>
0001823.05	P. 10 – Construction, retail, and manufacturing are NOT goods movement jobs or economic categories. Economists at the SCAG IEEP only include the warehousing and transportation and wholesale categories in goods movement. Other categories are indirect, at best.	<p>Comment noted. Goods movement industrial facilities are organized into three primary categories connected to NAICS industry classifications.</p> <p>Retail and Wholesale encompassing local/regional distribution centers and fulfillment/sortation/delivery centers (I.E, Amazon, Walmart, Home Depot, Target, Ross, United Natural Foods, etc.)</p> <p>Manufacturing including production and/or distribution facilities whether directly connected or not (I.E., California Steel Industries, Proctor & Gamble, Anheuser Busch, Mattel, Newell Brands, Northrop Gruman, etc.)</p> <p>Transportation & Warehousing including truck terminals, intermodal facilities, logistics/3rd-party providers utilizing warehouse facilities, cross-dock terminals, transloading facilities, etc. (NFI Industries, UPS, XPO, Weber Logistics, FedEx, etc.)</p> <p>The retail and wholesale and manufacturing categories are critical to reflect supply chain linkages connecting both B2B and B2C goods movement flows from industrial to wholesale and retail store relationships for localized consumption.</p> <p>Other goods movement industries that are a part of these supply chain linkages include construction, rental and leasing services, agriculture, utilities, and mining/quarrying, etc.</p>
0001823.06	P. 13 – Square footage is a massive underestimate compared to WarehouseCITY v.1.17 numbers – about 50% of the actual values estimated using other methods and other figures within this report (e.g.,Figure 7 vs. Figure 11)	Comment noted.
0001823.07	P. 25 – Rail is better for greenhouse gas emissions but is not better for air quality unless emissions controls are applied to locomotives to keep up with zero emissions vehicles for trucks.	Comment noted.
0001823.08	P. 28 – SR-60 is asserted to be within 5 miles of 50% of warehouse space in region, but this is demonstrably false.	Comment noted. Based upon the growth we've experienced over the past decade, SR-60 along with other east-west highway routes serve as the primary access to the region's warehouse space.

ID	COMMENT	RESPONSE
0001823.09	Figure 17 – Primary cargo airports in the region are not all passenger airports (SBD, RIV, SCS) are all key cargo airports that should be shown.	<p>Comment noted. Figure 17 - These three airports were left out of Figure 17 as their trend could not be measured across the same timeframe. Comparative data on air cargo tonnage for March Inland Port (MIP) is not publicly available, making direct comparison to other airports challenging at this time. The Southern California Logistics Airport is actively involved in air cargo operations. An airport map and list of tenants can be found on the airport webpage - https://www.victorvilleca.gov/home/showpublisheddocument/11640/638013561251630000. More recent tonnage information is provided on Page 33 for SBD.</p> <p>As part of the Comprehensive Sustainable Freight Plan Update, further consolidation of air cargo data will be updated to inform the next Connect SoCal update.</p>
0001823.10	Figure 18 – Please include SBD and RIV as important regional cargo airports	Comment noted. Monthly data is not publicly available for these airports.
0001823.11	P. 37 – Again fails to consider the option to reduce goods movement growth, which would be the least expensive way to reduce emissions growth.	<p>Comment noted. The predominance of freight related transportation activities in the region are driven by local consumption. The local consumption market directly from the Ports of Los Angeles, Long Beach, Hueneme, and San Diego includes Southern California, Central California, Arizona, New Mexico, Nevada, and Mexico for many intermediary product interchanges to finished goods.</p> <p>National freight flows will continue to be directly impacted by global issues and the cost to move freight. As witnessed the past decade, many variables outside of the control of the region will continue to have impacts. Regardless of where the future goods movement volume baseline may end up for Southern California, goods movement will continue to grow based on local consumption markets.</p>
0001823.12	P. 36-38 – This whole section is a great example of regulatory capture. Stop mansplaining on how beneficial this industry is. Do your part SCAG.	Comment noted.
0001823.13	P. 52 – Approximately 55% of warehouses are currently out of compliance with warehouse ISR and no emissions demand management policies have been considered or described – this is the key regulatory option SCAG has!	<p>Comment noted. SCAG is not a regulatory agency for the ISR which was adopted by the South Coast AQMD in May of 2021. SCAG does not serve as a regulatory agency in any capacity as related to state, district, or local mandated rules or regulations. SCAG has numerous studies, projects, and programs that focus on operational freight strategies, including the use of near-zero and zero-emission technologies. The Comprehensive Sustainable Freight Plan will serve as a major work effort to continue these operational assessments including freight demand management moving forward.</p>
0001823.14	P. 57 – Focusing solely on the economic benefits of goods movement in a community engagement study is perverse and a model of bad community engagement.	<p>Comment noted. This comment takes the study's efforts as stated in the Goods Movement Technical Report out of context, as the economic benefits reflected one component of the study's efforts as described. As stated in technical report, "To focus exclusively on community-freight associated issues, the Southern California Goods Movement Opportunities Assessment aimed to better understand goods movement communities' perspectives and opportunities." "It focused on public health, workforce development, and communications best practices." "Key products included a best practices toolkit for impacted communities, recommendations for impacted communities and the region, and a communications strategy for SCAG goods movement outreach."</p>
0001823.15	P. 73 – Automation – Driverless trucks and automated warehouses undermine all the jobs and economic benefits described in the rest of this technical report. Why devote 15% of our land to an industry that won't employ local people in 20 years?	<p>Comment noted. This section is focused on private industry trends associated with last-mile delivery.</p>
0001823.16	P. 78-79 Automation – Why devote such a large share of our transportation infrastructure to an industry that is shedding jobs and automating its land-use? That is subsidizing an industry that provides no local economic value and has huge infrastructure costs that are borne by residents.	<p>Comment noted. This section is acknowledging trends for newer technologies led by major gateways like seaports and private industry.</p>
0001823.17	Table 7 – Diesel vehicles will continue to be on the road from 2025-2042 time frame – reducing growth rates and Truck VMT in goods movement industry will have immediate benefits.	Comment noted.

ID	COMMENT	RESPONSE
0001823.18	Maps 3 and 4 are inconsistent in showing freight corridors.	Map 3 includes the FHWA's Primary Highway Freight System for the SCAG region. Map 4 includes truck volumes across key corridors and may not be representative of every corridor location as depicted on Map 3.
0001823.19	Figure 39 – These numbers do not match the CA EDD employment numbers for warehousing and transportation and significantly underestimate total employment in this sector (~440,000 as of 2022).	Comment noted. The numbers in Figure 39 from the BLS as aggregated are slightly higher than the numbers in Figure 38 from the CA EDD data for Transportation and Warehousing. We used two different sources as the BLS data was able to further disaggregate industry information versus relying solely on the CA EDD data.
0001823.20	<p>Table 14 – The proportion of truck trip VMT in Los Angeles County (55% of total in Table 14) is inconsistent with multiple other data sources that are proxies for truck trips</p> <ul style="list-style-type: none"> ▪ Relative area of warehouse space in the Inland Empire counties vs Los Angeles County (about 30% of warehouse area is in Los Angeles County) ▪ Diesel sales volumes report by counties in the state reported to California Energy Commission (CEC-A15)5 [https://www.energy.ca.gov/sites/default/files/2023-08/2010-2022%20CEC-A15%20Results%20and%20Analysis%20ADA.xlsx] - ~35% of diesel sales in LA County vs 50% in IE counties. ▪ Truck volumes reported by Caltrans on highways6 [https://gisdata-caltrans.opendata.arcgis.com/datasets/c079bdd6a2c54aec84b6b2f7d6570f6d_0/about] – volume weighted AADT is 55% Los Angeles County, but volume weighted truck AADT (not adjusted for route length) is 41% Los Angeles County. ▪ Trucking employment numbers by county from CA EDD indicate that the truck transportation employment in LA county (40,000) vs Inland Empire Counties (34,400) is not consistent with a truck volume being 55% in Los Angeles County. 	<p>Comment noted. When including all industrial goods movement industries (retail and wholesale trade distribution/fulfillment centers, manufacturing, transportation and warehousing, and others), Los Angeles County reflects the largest single county amount of industrial square footage occupied with approximately 42% of the total versus the Inland Empire's combined Riverside and San Bernardino county's nearly 41% total.</p> <p>Irrespective of this proxy and others mentioned, it should be noted that the substantial majority of truck trips are generated by internal types (only within the SCAG region) that equate to localized population, employment, household characteristics for consumption of products and services.</p>
Submitted by	Riverside Neighbors Opposing Warehouses	Submittal 0001825
0001825.01	<p>Dear SCAG, I just wanted to follow up on the comment letters I wrote on the PEIR with a couple of recently breaking stories highlighting the results from SCAG's Goods Movement Exceptionalism.</p> <p>The EPA just proposed rejection of the State Implementation Plan for zone in the SCAQMD. Additionally, there was a freight corridor improvement project to widen I-15 that fraudulently stated that truck VMT and AADT wouldn't increase by adding lanes. The I-15 express lanes 'Freight corridor improvement project' passed through SCAG's conformity analysis without appropriate skepticism or oversight. It raises serious questions about SCAG's role in upholding transportation conformity.</p> <p>If the EPA follows through, the region will lose billions in federal funding for transportation projects due to your ongoing Goods Movement Exceptionalism policy that is undermining attainment of the air quality standards. Please do your part SCAG.</p> <p>Mike McCarthy Riverside Neighbors Opposing Warehouses [REDACTED]</p>	<p>Comment regarding EPA's proposed disapproval of the SCAQMD SIP is noted. Regarding the I-15 Express Lanes project, as discussed in Chapter 6 of Connect SoCal 2024 Transportation Conformity Analysis Technical Report, SCAG's Transportation Conformity Working Group (TCWG) serves as the primary forum for interagency consultation on all matters related to both regional and project-level transportation conformity. The TCWG is the entity responsible for determining whether a transportation project is a project of air quality concern (POAQC). The TCWG consists of staff representatives of federal, state, and regional air and transportation agencies including the Federal Highway Administration/Federal Transit Administration (FHWA/FTA) and the U.S. Environmental Protection Agency (EPA) which are responsible for the final project-level POAQC determination. SCAG's role is to facilitate the federal Clean Air Act required interagency consultation through the TCWG.</p> <p>The lead agency of a transportation project is required to complete a comprehensive technical interagency review form, which is developed by the TCWG and is standardized for all transportation projects. The lead agency is then required to distribute and present the form, through SCAG, to TCWG for thorough review and subsequent determination whether the transportation project is a POAQC. Facilitated by SCAG staff, the completed form for the I-15 Express Lanes project has gone through the federally required interagency review and been determined by the TCWG to be not a POAQC.</p>
Submitted by	Riverside Neighbors Opposing Warehouses	Submittal 0001829
0001829.01.1	Thank you for the opportunity to provide comments on the SCAG Connect SoCal 2024 Programmatic Environmental Impact Report (PEIR) (the Project). The Project lays out a vision for regional transportation, land-use priorities, and goods movement over the next 25 years for the six SCAG counties based on poorly substantiated planning assumptions for regional demographics and a dystopian vision of endless logistics sprawl subsidized by inland county residents.	First and foremost, Connect SoCal's growth forecast is not a population projection. Unlike DOF and Caltrans population projections, SCAG produces a balanced projection of future employment, housing, and population. Furthermore, it is not intended to be and cannot be fully agnostic to policy changes. Given the regional objectives of housing, Regional Transportation Plan and Sustainable Communities Strategies targets, and myriad Regional Planning Policies, Connect SoCal's long-run growth projection is necessarily both (i) within the bounds of technical

In this letter, my comments will be on the demographic 'growth' (decline) projections used as the basis for many of the PEIR sections. The Connect SoCal plan technical report and PEIR project 11% growth to 20.8M residents (Table ES-1) in the population of the SCAG planning area by 2050. This projection is inconsistent with multiple other California state agencies which projected demographic decline; both the California Department of Finance and Caltrans projections forecast that SCAG's population peaked in 2018 and will never again be higher than ~18.9M people. Given the significant differences in demographic projections, it is necessary for SCAG to address the discrepancies in its forecast with multiple state agency forecasts and to provide reasonable planning alternatives projections that include population decline as part of its PEIR Alternatives analysis.

My comments reflect documents and datasets available including:

- Connect SoCal 2024 PEIR
- Connect SoCal 2024 Demographics and Growth Forecast Technical Report
- Connect SoCal 2020 Demographics and Growth Forecast Technical Report
- Population Projections: State of California, Department of Finance. Demographic Research Unit. State And County Population Projections 2020-2060 [computer file]. Sacramento, California. July 2023.
- State of California, Department of Finance, E-2. California County Population Estimates and Components of Change by Year, July 1, 2020-2023. Sacramento, California, December 2023.
- Caltrans Long-Term Socio-Economic Forecasts by County [1: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/data-analytics-services/transportation-economics/socioeconomic-forecasts/2022/2022-total-data/forecast-data-2022-a11y.xlsx>] - 2022 accessed November 2023
- US Census Bureau, Resident Population estimates by county – accessed November 2023 – vintage 2022 [2: <https://www.census.gov/data/tables/time-series/demo/popest/2020s-counties-total.html#v2022>]

Population Forecast Comparison

Table ES-1 of the PEIR indicates the key summary projections of population, household, and job growth by county, as well as for the entire planning region. This is explained in some detail in both the Demographics and Growth Forecast Technical Report and in the PEIR section 3.14. On a simple level, the demographic projections are a function of births, deaths, immigration, and domestic migration. Three scenarios were examined by SCAG, with the baseline projection indicating an 11% growth in population by 2050. Higher (20+%) rates of growth are forecast in Riverside and San Bernardino County, while single digit rates of growth are forecast for Los Angeles, Orange, and Ventura Counties. Additionally, SCAG performed two sensitivity analyses to look at higher and lower rates of growth, as shown in Figure 2 of the Demographics technical report. Figure 4 in the Demographics technical report provides the projected baseline components for the four components that make up the simplified aggregate demographics forecast.

Superficially, this appears to be reasonable and robust. However, the lowest projected scenario of growth by SCAG forecasts a population of ~19.5M people; this 'lower-bound' estimate is higher than the California Department of Finance and Caltrans projections of growth by more than 1.4M people.

Table 1 shows 2050 baseline projections for SCAG, the CA Department of Finance (CA DoF) and Caltrans by county and in aggregate.

reasonableness given data and expertise existing at the time of forecast development, and (ii) reflects a future in which policy, and the response to policy by people and markets, result in the achievement of certain goals (see Technical Report Section 2.4 and Figure 2). This is captured in the executive summary of the TR:

“The forecast projects Slower Growth, Steady Improvement, reflecting a substantially lower population growth rate than in prior plans, but also reflecting recent strength in housing production following a shift in state and local policies. This forecast assumes the region is successful in alleviating much of the latent housing demand which has built up in past decades by projecting household growth in excess of the 6th cycle regional housing needs determination of 1,341,827 housing units and also projecting 30 percent higher household growth during the 2020s than the previous Connect SoCal plan. This is crucial for supporting the level of employment growth that is anticipated in Southern California.”

Nonetheless, while the region's population declined notably in recent years, from 2020-2023 143,000 new housing units were built in the region, exceeding every three-year period since 2006 (see Figure 6). By 2022 regional employment had also matched its 2019 pre-COVID peak—which was 447,000 jobs higher than the 2016 base year of the previous Connect SoCal plan (see Figure 7).

(continues in response to comment 0001829.01.2)

0001829.01.2

Table 1 – Population projections for the SCAG region for Connect SoCal 2024, CA DoF P-2A and Caltrans.

Continued from response to comment 0001829.01.1:

This projection's scope also differs from DOF and Caltrans since it was reviewed by the region's

[See Table 1 in attachment]

On a regional basis, CA DoF P-2A forecasts a decline of 4% to 18.1M and Caltrans forecasts a decline of 7% to 17.4M residents by 2050. Both estimates are largely due to rapidly declining population projections of Los Angeles County population to ~8.8 to 8.9M by 2050, in stark contrast to the 10.8M projection by SCAG. The difference of ~2M residents in Los Angeles accounts for most of the differences between the three projections, although there are also some other important county specific differences between projections.

It is important to remember that the adopted demographic forecast for Connect SoCal 2020 was even more optimistic, projecting a population of 22.5M by 2045 with an estimated population growth of 19% over that planning period. It has been completely wrong to date; a failure of demographic projections that leaves the SCAG RTP/SCS plan wrong-footed for adjusting its budget and planning assumptions.

Methodologically, it appears that the projections of SCAG are optimistic in three ways.

- Birth rate – SCAG projects birth rates to stabilize, rather than continue to decline as seen in birth rates around the developed world.
- Foreign migration – SCAG projects foreign immigration numbers to go up to over 100,000 residents per year, a level not seen since the turn of the century. This does not seem likely given the recent decade of immigration policy.
- Domestic migration – SCAG projects domestic migration out of the region to decline and to drop below -100,000 residents, which is a level not seen for the last decade.

It is also notable that the SCAG technical report fails to adequately discuss or address that population declines in SCAG counties began before the COVID pandemic in 2020 and that regional population peaked in 2018 according to the US Census. Figures 1 and 2 display the US census cumulative and county specific populations from 2000 through 2022. It is clear from both the cumulative SCAG regional plot and the individual county graphs that existing secular declines in population had started prior to the Connect SoCal 2020 plan. It is unclear why SCAG believes that the existing trends in population data from 2018 through 2023 in the region will be rapidly reversed when multiple other state agencies have publicly revised their demographic forecasts to a long-term decline in the last few years.

[See Figure 1 in attachment]

Figure 1. US Census estimates of SCAG region population from 2000-2022. Population estimates for the region peaked in 2018 and declines in population began prior to the COVID pandemic.

[See Figure 2 in attachment]

Figure 2. US Census estimates of SCAG county population from 2000-2022. Declines in population in Los Angeles, Orange, Ventura, and Imperial Counties began prior to the COVID pandemic.

Lastly, the California Department of Finance released a December 2023 preliminary estimate [3: https://dof.ca.gov/wp-content/uploads/sites/352/2023/12/PressRelease_July2023.pdf] for county and state populations for July 1, 2023 table E-2. In the most recently released dataset, every single SCAG county had a decline in population from 2022 to 2023. In a surprise to me, both Riverside and San Bernardino Counties had declining populations, with San Bernardino showing significant percentage declines higher than the coastal counties. San Bernardino County's population declined by a higher percentage (0.40%) than Los Angeles (0.15%) or Orange County (0.37%).

Table 1[sic]. Summary of SCAG county population change from 2022-2023 in CA Department of Finance Table P-2A, released December 19, 2023.

local jurisdictions so that bottom-up development potential—particularly infill and small units that represent a rapidly increasing share of new housing—are adequately reflected in its assumptions (see page 16). By a wide margin the biggest difference between Connect SoCal's future population and the other two sources referenced is that we foresee fewer people leaving the region in the long-run, meaning that today's Southern Californians are more likely to be able to continue to call this region home.

In addition to this regional planning consideration, the nature of the Plan results in additional process differences from other population forecasts. Because of statutory requirements described in section 1.2, this projection is principally concerned with 2050. This is now noted more clearly in the 2nd paragraph of the Technical Report's section 3.1.

Owing to the degree of local review undertaken as well as the necessity of also producing the forecast at the Transportation Analysis Zone (TAZ) and smaller spatial scales (Caltrans and DOF forecasts exist only at the county level) – this forecast is updated only once every four years—roughly three of which are spent updating any given regional plan. The tradeoff is that the projection is less nimble in reacting to county-level data updates which become available mid-cycle. However, despite the delay of detailed Census 2020 data until May 2023, this forecast made a substantial downward adjustment to base year (2019) population based on the Census 2020 redistricting file which became available in August 2021.

Note as well that at the time of this writing, the population decrease which began in approximately January 2019 had almost entirely subsided by July 2023 (Exhibit 3, <https://scag.iqm2.com/Citizens/FileOpen.aspx?Type=1&ID=2475&Inline=True#page=48>). This is in large part due to the rebound in domestic migration—particularly in LA county, which had fewer people leave in 2022-23 than any year since 2011-12. More domestic migration detail was also presented to SCAG's Joint Policy Committee <https://scag.iqm2.com/Citizens/FileOpen.aspx?Type=1&ID=2287&Inline=True#page=189>. Given a 3-decade forecast horizon, considering more than the previous ten years of migration data is appropriate. Domestic migration is more economically dependent than other components of population change and is reflective of an equilibrium condition between US regions based on job growth and living costs (see page 34, and e.g. Shubert 2021 at <https://jchs.harvard.edu/blog/do-workers-fleeing-house-price-growth-take-boom-them-they-go>, which shows faster home price appreciation in secondary markets).

SCAG's Demographic Panel of Experts, which includes REMI and UCLA Anderson economic forecast leads as well as the chief producers of Caltrans and DOF population forecasts (see Table 1, <https://scag.iqm2.com/Citizens/FileOpen.aspx?Type=1&ID=2287&Inline=True#page=146>), did not foresee Southern California shrinking to a smaller share of US economic output, making it difficult to see jobs decreasing in the long-run. This is further supported by recent employment and housing increases despite population decline.

Additional detail on assumptions and population components are available in the above-linked report. It should be noted that while fertility rates are expected to stabilize, births will continue to decrease later in the forecast due to an aging population—a contrast to the prior projection which had assumed a rebound. In addition, neither projected foreign immigration nor domestic migration rates are outside of what has been observed in the prior thirty years (see Table 4 of the Technical Report).

Section 3.1 of the Technical Report addresses the population decline directly. But the following is now added to make a clearer acknowledgement that population decline began before COVID: "The region's population has declined since its estimated peak of 18,966,261 in approximately January 2019. The decrease reflects both the long-term trend toward slower growth as well as disruptions related to the COVID-19 pandemic."

(continued in the response to comment 1829.01.3)

0001829.01.3 In combination, the data shows a clear trend – population decline in Southern California counties. None of the three forecasts of population projected declines in Riverside or San Bernardino counties until ~2040-2050 – yet it just happened in 2023. Every single county declining in population suggests an inflection where even intra-regional population transfer from the Coastal counties to the Inland counties is giving way to domestic out-migration. Differentials in cost-of-living from the Coastal counties to the Inland counties no longer provides the relief necessary to accommodate lower and middle-income households with opportunities for home ownership or prosperous employment, largely due to the singular fixation and explosive growth in goods movement land-use tearing down blocks of homes in the Inland counties to build warehouses.

(continued from response to comment 0001829.01.2):

Regarding Inland Empire growth especially in the later years of the forecast, the expectation nationally and globally is of slowed or negative population growth due to the high mortality of the large baby boomer cohort. Cost-of-living differentials impact both inter-regional domestic migration and a certain amount of “Coastal-to-inland” migration; however, the expectation is that there is an improved balance between housing and job provision across the region by 2050 (see Table 2).

The latest available data will be integrated into 2028 plan development. Given how dynamic population changes have been in recent years, adding flexibility where possible to the 2028 plan process would represent an improvement. It should be noted as well that the DOF population projection referenced – the first to project a long-run decline in the region – was an interim series released in mid-2023 while the Demographic Research Unit awaits final Census 2020 data.

Nonetheless, a lower future population projection might be not be inconsistent with the employment projections in Connect SoCal 2024 due to sustained low unemployment and double-jobbing rates. It may not be inconsistent with the existing housing projection if average household sizes were to drop even further than the current decrease (from 3.0 in 2019 to 2.6 in 2050). Given that smaller households and workers each travel more per-capita, the transportation implications are heavily dependent on the future level of jobs and housing—not simply the population projection. As such, it would be incorrect to assume that based on the population projection alone the RTP/SCS is wrong-footed for adjusting its budget and planning assumptions.

For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at:

<https://scag.ca.gov/peir>

0001829.02 PEIR and Policy Implications

Population projections affect the program budget, GHG emissions, AQ projections, energy, land-use and planning, households, jobs, and transportation sections of the PEIR. Additionally, the population change will have spatial implications for project planning and priority growth areas, since population decline is strongest in Los Angeles County which is the focus of a large fraction of the total SCAG priority project areas.

Given the scope of PEIR analysis that depends on population growth projections, it is critical for SCAG to address this deficiency in its analysis and include reasonable lower bounds for population growth that reflect the assumptions of demographers in other California state agencies.

For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-12 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at:

<https://scag.ca.gov/peir>

ID	COMMENT	RESPONSE
0001829.03	<p>CEQA Requirements</p> <p>The California Office of Planning and Research website states that CEQA 'is intended to inform government decisionmakers and the public about the potential environmental effects of proposed activities and to prevent significant, avoidable environmental damage.' Decisionmakers and the public need to be actively informed in this planning document of a reasonable range of possible future demographic projections Due to the critical importance of the direction of population growth or decline, and the contrarian demographic projections in the PEIR compared to other state agencies, it is necessary for SCAG to take extraordinary steps to justify its approach.</p> <p>SCAG has multiple obligations to ensure that decisionmakers and the public are adequately informed.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-12 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001829.04	<ul style="list-style-type: none"> • First, SCAG needs to update the Demographics and Growth technical report and PEIR population sections with a thorough discussion of why its projections are so much higher for Los Angeles County and the SCAG region than CA DoF and Caltrans demographic projections. • Second, SCAG needs to substitute the average of the Caltrans and CA DoF projections as a reasonable lower bound for demographic projections for the SCAG region unless it believes those agencies are completely in error in their baseline projections. If SCAG believe that state agency projections are unreasonable, then it needs to provide a completely transparent methodological discussion and compare the year-by-year birth, death, domestic, and foreign migration numbers to state agency projections to justify its choices. 	<p>In contrast to other purely population projections such as those produced by DOF and Caltrans, Connect SoCal 2024's growth forecast strives for a balance between future population, housing, and employment (see Section 2.6 of the Technical Report). Projections at 5-year intervals are available in Table 12 and past and future population change components are available in Table 4. See more detail in the response to comments 0001829.01.1, 0001829.01.2, and 0001829.01.3.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-13 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001829.05	<ul style="list-style-type: none"> • Third, and most importantly, SCAG should include an ‘Alternatives’ analysis in Section 4 of the PEIR that compares the project impacts under a declining population scenario. This should include a discussion that addresses: <ul style="list-style-type: none"> o change in the budget <ul style="list-style-type: none"> ▪ How does budget change in absolute terms? ▪ How does budget allocation shift among different categories (O&M, transit, new projects)? ▪ How does budget allocation shift spatially? o the changes in project lists o how priority areas shift if population in LA county declines by 2M residents o implications for air quality and greenhouse gases o the relative growth rate and infrastructure maintenance cost for increasing Goods Movement under a declining population base o implications for transit projects and locations (shift to inland empire?) o change in land-use required if population and household is 15% lower than baseline scenario o Change in projected transportation baseline in 2050 with significantly lower population o Change in energy required for electrification in 2050 with lower population <p>The RTP/SCS is an important planning exercise that will direct many project and land-use decisions over the next 5 years. It is extremely important to consider the range of possible outcomes and begin to do thorough planning for the existing negative population growth observed in the region from 2018. American cities and MPOs that have failed to accurately project population declines (largely in the Midwest) have been caught in a ‘doom-loop’ of outsized O&M budgets that prevent new transportation projects from being funded by a declining population.</p> <p>It is impossible to create a contingency plan to deal with a population doom-loop affecting long-term transportation planning if SCAG refuses to plan for the possible future of declining population. Since SCAG is the outlier projection and is relying on both CA DoF and Caltrans for its planning, it is important that SCAG account for a reasonable range of projected populations and do some thorough contingency planning in case the recent demographic trends continue to surprise to the downside.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-12 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001829.06	<p>Connection to Goods Movement</p> <p>Demographic analysis is a tangent to the intent of my critique of the PEIR and its treatment of Goods Movement. Population in Southern California is declining, at least partially because of land-use and transportation planning choices that prioritize profits and pollution over people. SCAG cannot deal with the underlying issues associated with its land-use planning policies with its metaphorical head buried in the sand. Goods movement is projected to take a larger and larger fraction of the transportation infrastructure in our region, and demographic decline will accelerate this trend. Please perform a realistic planning exercise that accounts for the very real possibility that this region will never grow in population again. Project how much of our infrastructure in the Inland Empire will be devoted to trucks and freight trains in the future as population declines. Then ask yourself the question if that is a place you would be attracted to live in as a young person planning your future. A warehouse, truck, and rail dystopia is not my vision of an attractive place for future generations to choose for their homes.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR ORG-12 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
Submitted by	San Bernardino County Transportation Authority	Submittal 0001773

ID	COMMENT	RESPONSE
0001773.01	<p>The San Bernardino County Transportation Authority (SBCTA) appreciates the opportunity to provide comments on the Southern California Association of Governments' (SCAG's) draft 2024 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and draft Program Environmental Impact Report (PEIR). Both documents have been very professionally prepared, with substantial input over the last several years from County Transportation Commissions (CTCs), councils of governments (COGs), local jurisdictions, other transportation agencies, advocacy groups, and the public. We appreciate the working relationship we have had with SCAG to bring the 2024 RTP/SCS to this point in its development. We look forward to the Regional Council's approval of the RTP/SCS and receiving subsequent federal approval for the RTP and state approval for the SCS.</p> <p>Our comments can be classified into three general themes:</p> <ul style="list-style-type: none"> • A summary of SBCTA's transportation and sustainability activities over the last several years that support implementation of the 2020 RTP/SCS • Overall perspectives on the 2024-2050 RTP/SCS • Specific comments on the content of the draft RTP/SCS and PEIR. 	<p>Comment noted.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter TRANS-2 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001773.02	<p>SBCTA TRANSPORTATION AND SUSTAINABILITY INITIATIVES</p> <p>As you are aware, SBCTA/SBCOG and our local partners (transit agencies and local jurisdictions) have made great strides in implementing projects and pursuing sustainability initiatives throughout San Bernardino County, consistent with prior cycles of the RTP/SCS. These activities represent important contributions to sustainability region wide, and we thought it would be appropriate to highlight some of these in our comment letter on the RTP/SCS.</p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001773.03	<p>In brief, the following are recent and ongoing sustainability initiatives of SBCTA:</p> <ul style="list-style-type: none"> • Transit investments – Since the adoption of the 2020 RTP/SCS, significant strides have been made on transit investments: the nine-mile Arrow rail system being put into revenue service in October 2022; initiation of construction on the Zero-Emission West Valley Connector Bus Rapid Transit (BRT) line, our second BRT line in the Valley; working with Brightline West and California Department of Transportation (Caltrans) to place high-speed rail in the median of I-15 from Apple Valley to Rancho Cucamonga and helping Brightline to secure funding; and working with all our transit agencies to bring transit service back to pre-pandemic levels. • Zero-Emission (ZE) - Preparation of the ZE Bus Study Master Plan in 2020 and working with our transit agencies to incorporate ZE buses into their systems; working with industry to fund and implement two hydrogen fueling stations and one electric truck charging station on critical freight corridors to accelerate the transition to ZE trucks. • Preparation of the Inland Empire Comprehensive Multimodal Corridor Plan in 2020, with an update in 2022, in collaboration with Riverside County Transportation Commission, Caltrans, and SCAG. • Active transportation – we have delivered or are in the process of delivering significant bicycle/pedestrian projects and programs with the assistance of \$60 million in State Active Transportation Program grants; completed the countywide Points-of-Interest Pedestrian Plan in 2022; and completed the Comprehensive Pedestrian Sidewalk Inventory Plan in 2023. • Expansion of the rideshare/vanpool program in San Bernardino County. There are approximately 270 vans in the program between those managed by the Victor Valley Transit Authority and SBCTA. • Completion of the Regional Conservation Investment Strategy, pursuant to AB 2087 and acceptance by the California Department of Fish and Wildlife. • Completion of the San Bernardino County Regional Greenhouse Gas (GHG) Reduction Plan in 2021 and GHG Reduction Plan Environmental Impact Report in 2023. This was an update to address the GHG reduction goals of SB 32. • Initiation of the Inland Regional Energy Network in 2022 with Western Riverside COG and Coachella Valley Association of Governments. • Preparation of the Inland Empire Regional Climate Adaptation Toolkit <p>The SBCTA Sustainability web page has additional information and can be accessed at: https://www.gosbcta.com/planning-sustainability/?term=250</p>	Comment noted.
0001773.04	<p>OVERALL PERSPECTIVES ON THE 2024 RTP/SCS</p> <p>SBCTA has some overall perspectives for how the RTP/SCS can be used to achieve the mobility, safety, and sustainability goals of the region in the coming years. These comments relate to our Countywide Transportation Plan (CTP) and the current update to the Long Range Multimodal Transportation Plan (LRMTP, to be finalized in 2024), along with perspectives on our multimodal transportation system and managed lane network, goods movement, transit service, transit oriented development (TOD), and reduction in GHGs and vehicle miles of travel (VMT).</p>	Comment noted.

ID	COMMENT	RESPONSE
0001773.05	<p>SBCTA's CTP/LRMTP and Relationship to the 2024 RTP/SCS</p> <p>The CTP outlines a path forward for a sustainable transportation future, laying out an achievable strategy for highway and transit facilities, TOD, air quality, GHG reduction, freight, airports, transportation demand management (TDM), active transportation, and funding. The CTP analyzes two future scenarios: a "baseline scenario" that assumes traditional revenue sources (generally consistent with what the RTP/SCS defines as "core revenues") and an "aggressive scenario" (generally consistent with RTP/SCS "Plan" revenues, including the new reasonably available sources identified in the Plan). The projects and programs in the aggressive scenario of SBCTA's updated CTP are consistent with the lists in SCAG's RTP/SCS. SBCTA may provide SCAG with any technical corrections to the San Bernardino County portion of the RTP/SCS project list in a separate communication, pending discussions with our local jurisdictions, so that the changes can be incorporated into the final RTP/SCS project list, if necessary.</p>	<p>Comment noted. Further updates to the Project List Technical Report can be made through Amendment #1 of Connect SoCal-2024 RTP/SCS, which will be concurrent with the 2025 FTIP development and is currently being prepared. Please communicate any necessary updates with SCAG staff within the timeline for capturing project list updates.</p>
0001773.06.1	<p>Need for a Balanced, Multimodal Transportation System</p> <p>As noted above, SBCTA has a strong multimodal and ZE focus in our transportation programs, investing heavily in the transit system, TDM, and active transportation. At the same time, our residents and businesses remain extremely concerned about living up to the commitments in our Measure I half-cent sales tax. Much of the concern centers around the congestion on freeways, interchanges, and the regional arterial system. We have prioritized interchange improvements and are proceeding to deliver those improvements, having completed 13 major interchange projects in the last 15 years. We are under construction or nearing construction for ten additional interchanges and are working with local jurisdictions on strategic ramp improvements. Interstates 10 and Interstate 15 (I-10 and I-15) are being addressed largely through our managed lane strategy, as described in the next section. In other words, we cannot afford to neglect highway improvements as we also aggressively pursue a sustainable future.</p>	<p>Comment noted. SCAG acknowledges and appreciates the efforts of SBCTA to deliver for San Bernardino County residents by investing in transit, TDM, and active transportation, and by living up to commitments made through its Measure I half-cent sales tax measure.</p>
0001773.06.2	<p>We appreciate SCAG's acknowledgement of the need for Bottleneck Relief, as stated on page 112 of the RTP/SCS: "As part of Connect SoCal and SCAG's comprehensive regional goods movement planning, bottleneck relief analysis and implementation strategy development has served to identify areas with the worst congestion and delay characteristics. Targeted regional investments will implement a menu of improvement strategies focused on freight corridors to improve the flow of people and goods." In other words, we appreciate that the RTP/SCS acknowledges that highway improvements are still necessary, even though most of the attention is being given to trip-reduction strategies, with the goal of reducing GHGs and VMT.</p>	<p>Comment noted.</p>
0001773.07	<p>At the same time, it is important to acknowledge that each individual project should not be expected to reduce VMT. What is important is the impact of the overall strategy. In San Bernardino County, the RTP/SCS shows that VMT per capita is being reduced by 4% between 2019 and 2050 just with the "baseline" investment and by almost 11% with the "Plan" investment (see page 179). This represents billions of dollars of investment in regional transit and trip reduction measures over that time period and appears realistic for San Bernardino County to achieve. Some of the latest data on VMT compiled by SCAG (as reflected in the January 2024 Community, Economic, and Human Development Committee agenda), shows a VMT reduction of approximately 5-6%, from pre-pandemic to post-pandemic, attributed at least in part to the broad-based use of virtual travel. While more aggressive VMT reduction goals have been identified in other statewide plans (e.g. 25% reduction in the California Air Resources Board Scoping Plan update), those numbers should be viewed as aspirational and cannot be defended with any credible analytics. SCAG's modeling for the RTP/SCS should be used as the authoritative source.</p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001773.08	<p>When it comes to specific projects in the RTP/SCS, some will reduce VMT and others will increase VMT, but the net effect will be a reduction in VMT per capita over time. SBCTA continues to contend that single projects should not be held to a VMT reduction target, and state/regional agencies should not impose that requirement at the project level. We will continue to work with Caltrans to come up with fair and reasonable ways of addressing VMT at some combination of the regional and project level, including a VMT Mitigation Bank concept to be pilot tested in San Bernardino County over the next two years in collaboration with SCAG.</p> <p>It should be noted that the rate of population growth tends to outstrip the per capita VMT reductions that can be achieved. Therefore, expectations of VMT reduction need to be tempered based on what is realistic. This also means that, for mobile sources, the path to GHG reduction will largely fall on energy efficiency, technological innovations (including continued advancements in virtual travel), and more rapid turnover of vehicle fleets to zero-emission. The GHG analysis in the California Transportation Plan demonstrated that vehicle and fuels technology will be the primary way in which GHG reduction goals will need to be met. While VMT reduction is an appropriate goal, technology will be the principal path to long term GHG reduction. SBCTA looks forward to partnering with SCAG, the state, and the utility industry to pursue these opportunities, consistent with initiatives we have mentioned earlier, while doing what we can with VMT reduction. All parties need to recognize that no one-size-fits-all as far as the strategy for GHG and VMT reduction is concerned.</p>	<p>Comment noted. SCAG awarded over \$3 million in REAP 2.0 dollars to the San Bernardino County Vehicle Miles Traveled Mitigation Bank.</p>
0001773.09	<p>Regional Express/Managed Lane Network</p> <p>As indicated in the RTP/SCS, SBCTA has two major express/managed lane initiatives: I-10 from the Los Angeles County line to Ford Street in Redlands, and I-15 from the Riverside County line, up the Cajon Pass and to the Victor Valley. These projects are not only multimodal projects for passengers, with pricing benefits for buses, vanpools, and 3+ carpools, but they will significantly improve freight mobility as well. Each project includes auxiliary lanes to improve truck operations and safety, and will take some of the auto travel out of the general purpose lanes.</p> <p>It is noteworthy that the I-10/I-15 interchange, at the heart of Inland Empire logistics activity, is designated as the tenth most critical freight bottleneck in the United States (per the American Transportation Research Institute), and the I-10 and I-15 corridors represent the major gateway from/to Southern California to/from the rest of America. The express/managed lanes will also permit light duty (under 10,000 pounds) commercial traffic. Improvement of these corridors is a win-win for both multimodal passengers and freight, but will need to be staged over the duration of the RTP/SCS.</p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001773.10	<p data-bbox="212 94 384 118">Goods Movement</p> <p data-bbox="212 151 1123 516">As you know, San Bernardino County is a beneficiary of the logistics industry and is at the same time heavily impacted by it. SBCTA appreciates SCAG's analysis of bottlenecks in the RTP/SCS, especially the detailed analysis and explanation of the freight bottlenecks on Map 11 and pages 100 through 106 of the Goods Movement Technical Report. In fact, we would request that Map 2.1 on page 39 of the main RTP/SCS report be replaced by Map 11 on page 104 of the Goods Movement Technical Report. We make this suggestion for several reasons: 1) state policy has de-emphasized congestion from a person-movement standpoint, while recognizing the importance of congestion relief for freight; and 2) the freight bottleneck map provides a better representation at a regional level of the magnitude of the supply chain problems we are collectively trying to fix. The complete listing of bottlenecks does not need to be provided in the full report, but highlighting Map 11 and a basic explanation of the freight bottlenecks for context would be helpful in conveying the magnitude of the freight challenges we face on the highway system. Map 2.1 does not really accomplish that.</p>	<p data-bbox="1136 94 1921 118">Map 2.1 is updated to include Map 11 from the Goods Movement Technical Report.</p>
0001773.11	<p data-bbox="212 557 296 581">Aviation</p> <p data-bbox="212 613 1123 922">Aviation receives very little mention in the main Connect SoCal report. Given the importance of aviation as a mode, we would suggest that SCAG add at least some of the background information from the Executive Summary of the Aviation and Airport Ground Access Technical Report. We appreciate that SCAG has drawn its airport passenger forecasts directly from the airport authority forecasts in this cycle of the RTP/SCS. We agree that the airport authorities are in the best position to make those assessments, in collaboration with the Federal Aviation Administration. Forecasts are presented in the Aviation Technical Report. Whether they need to be presented in the full report is a judgment call on the part of SCAG, but it is expected that there will be considerable interest in those forecasts. Ontario International Airport continues to be one of the fastest growing commercial airports in the United States, and San Bernardino International Airport has also begun to serve commercial passenger travel.</p>	<p data-bbox="1136 557 1711 581">Comment noted. The text is updated to reference to aviation.</p>
0001773.12	<p data-bbox="212 963 531 987">Greenhouse Gas (GHG) Reduction</p> <p data-bbox="212 1019 1123 1157">The 2024 RTP/SCS demonstrates that the SB 375 GHG reduction targets for the region are met for 2035. SBCTA has been aggressively working on GHG reduction strategies and implementation within San Bernardino County through our Regional GHG Reduction Plan and the Climate Action Plans of our local jurisdictions. As highlighted earlier, we are being very proactive on sustainability and GHG reduction initiatives.</p> <p data-bbox="212 1190 1123 1383">At the same time, it is important to recognize that we need a robust highway network to remain competitive from a logistics standpoint. A strong economy is required for both the private and public sectors to afford the technology needed to meet air quality standards and achieve the requisite GHG reductions. It should also be understood that a thriving economy in a growing county like San Bernardino can result in an increase in VMT. While we understand that reductions in VMT can be helpful to GHG reduction, there are limitations on the extent to which VMT can be reduced, as discussed previously.</p>	<p data-bbox="1136 963 1297 987">Comment noted.</p>

ID	COMMENT	RESPONSE
0001773.13.1	<p>Programmatic Environmental Impact Report (PEIR)</p> <p>Regarding the PEIR, we appreciate the structure of the document and the mitigation measures. The mitigation measures encourage action, but do not put requirements on the CTCs or local jurisdictions beyond those already required by the State. It also acknowledges that project-level environmental studies will need to be conducted prior to the implementation of any specific project, which is why a lesser level of detail was provided in the PEIR. We have no further comments on the PEIR.</p>	<p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter TRANS-2 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001773.13.2	<p>As stated earlier, SBCTA appreciates all the efforts by the SCAG Regional Council and SCAG staff to make the 2024 RTP/SCS a reflection of where the region is headed over the next 26 years. We look forward to continuing partnerships with SCAG to implement the projects and programs in the RTP/SCS. Attachment 1 provides a few more specific comments or suggested edits to specific pages of the RTP/SCS.</p>	<p>Comment noted.</p>
0001773.14.1	<p>ATTACHMENT 1. SPECIFIC COMMENTS AND SUGGESTED EDITS ON THE 2024 RTP/SCS</p> <p>Page 152 and following (Section 4.3) – In the discussion of core revenues, the importance of the local sales tax measures is highlighted several times. It is stated that “These taxes account for more than half (58 percent) of local core revenue sources in the Plan.” It is also noted that the current measures for Orange, Riverside, and San Bernardino Counties all sunset at about the same time, between 2039 and 2041. What is not clear is whether the core revenue forecast assumes extensions of the measures to provide revenue through the horizon year of 2050. It would appear the assumption is that the local sales tax revenue would continue through 2050, based on the county-level core revenue forecast in Table 4.2 on page 153, given that the revenue continues to increase in each of these three counties. But this is not explicitly stated. Please clarify.</p>	<p>Language added to Appendix 1 to clarify that the financial plan does not assume the continuation of local option sales taxes beyond current expiration dates.</p>
0001773.14.2	<p>Page 159, Table 4.3– Please change the references to “Virgin Trains” to “Brightline West.” The references to Virgin Trains should also be changed in the several locations where they occur within the RTP/SCS Project List.</p>	<p>Virgin Trains has been updated to “Brightline West”. FTIP ID #LA9919125 is the only project in the Project List Technical Report that references “Virgin Trains”. Please communicate with LA Metro to update this FTIP project during the next FTIP amendment, since they are the lead agency.</p>
0001773.14.3	<p>Page 159, Table 4.3– Section 4.3 of the RTP/SCS notes that \$162 billion of the \$750 billion total revenue will be from “new reasonably available sources.” This represents about 22 percent of the total. Approximately 60% of the new revenue is shown to be from the Local Road Charge Program, as described on page 159. The program “assumes a \$0.020 (in 2019 dollars) per mile charge throughout the region that can be implemented on a county basis.” Based on Table 4.5.1 on page 170, the Local Road Charge Program is projected to be fully operational in all counties beginning in 2035. While the schedule for implementation provides 10 years of planning and preparation, SCAG will need to provide additional information subsequent to approval of the RTP/SCS regarding how the Local Road Charge Program is expected to work and what the responsibilities of the CTCs are expected to be.</p>	<p>Comment noted. SCAG staff will continue to work with county transportation commissions and other stakeholders to evaluate the impacts of the new transportation user fees. SCAG’s key guiding principles for financial strategies promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. The Local Road Charge included in Connect SoCal 2024 assumes leveraging state and federal mileage-based user fee system technology to ensure interoperability and facilitate allocation of resulting revenues to reflect system usage.</p>

ID	COMMENT	RESPONSE
0001773.14.4	<p>Page 171, Table 4.5.2– It is noted that transit operations and maintenance costs are expected to triple between the first five years of the plan and the last five years of the plan from \$26.3 billion (2025-2029) to \$81.8 billion (2045-2050). The operations and maintenance costs for passenger rail will increase by over five-fold. Transit/rail operations and maintenance is the largest single category of costs in the RTP/SCS, representing 39% of the RTP/SCS expenditures. While this increase in transit operations and maintenance costs includes the effect of inflation, it also includes significant increases in service, as well as transition to zero-emission bus fleets and rail technology, in the effort to achieve the California State Legislature’s goals of GHG and VMT reduction. It is critical that the transportation agencies in the SCAG region impress upon the legislature and Governor that the state must step up the plate to assist in the funding of transit operating and maintenance costs. The state has placed a great deal of emphasis on grant funding for capital expansion of transit systems. SBCTA has been very proactive in these investments for San Bernardino County. However, it is imprudent to build what we are unable to operate, and the state has an obligation to help local agencies in funding of the transit/rail operations and maintenance costs required to achieve the statewide goals. The state also needs to be proactive with the federal government to impress upon them the importance of increasing their funding share devoted to transit operations and maintenance.</p>	Comment noted.
Submitted by	San Gabriel Valley Council of Governments	Submittal 0001715
0001715.01	<p>In Table 1 (FTIP Projects) on page 57, please update the project with FTIP ID number “LA990359” as follows:</p> <ul style="list-style-type: none"> • Remove “- ITS 2318 SAFETEA #2178;1436 #1934 PPNO 2318. NOGALES(LA) PROJECT INCLUDES WIDENING FROM 2 TRAVEL LANES TO 4 TRAVEL LANES OF E. WALNUT DRIVE NO. EAST OF NOGALES FOR 2600 LINEAR FEET AND WIDENING FROM 2 TRAVEL LANES TO 4 TRAVEL LANES OF GALE AVE. WEST OF NOGALES FOR 1900 LINEAR FEET.” as stated in the project description. • Add “Alameda Corridor-East” to the beginning of the description. • Update the project cost to \$1,987,600 (\$1,000’s). 	<p>FTIP ID #LA990359 is revised as requested to note the updated project description. The update does not impact transportation modeling. Please reprogram the funding increase by submitting through an FTIP amendment once the final Connect SoCal 2024 is approved. Programming updates require additional funding details such as source and schedule information.</p>
0001715.02	<p>In Table 2 (Financially Constrained Projects) on page 213, please update the following projects as follows:</p> <ul style="list-style-type: none"> • RTP ID “LA990359”: <ul style="list-style-type: none"> - Remove route name, from, and to. - Remove “- ITS 2318 SAFETEA #2178;1436 #1934 PPNO 2318. NOGALES(LA) PROJECT INCLUDES WIDENING FROM 2 TRAVEL LANES TO 4 TRAVEL LANES OF E. WALNUT DRIVE NO. EAST OF NOGALES FOR 2600 LINEAR FEET AND WIDENING FROM 2 TRAVEL LANES TO 4 TRAVEL LANES OF GALE AVE. WEST OF NOGALES FOR 1900 LINEAR FEET.” as stated in the project description. - Add “Alameda Corridor-East” to the beginning of the description. - Update the project cost to \$1,987,600 (\$1,000’s). • RTP ID “1120015” - Montebello Blvd. (Montebello): <ul style="list-style-type: none"> - Update the completion year to 2027. - Update the project cost to \$206,036 (\$1,000’s). • RTP ID “1200L002” – Hamilton Blvd., Park Ave., Main St., Palomares St., San Antonio Ave., City of Pomona: <ul style="list-style-type: none"> - Update project cost to \$32,303 (\$1,000’s). • RTP ID “1200L004” - Maple Ave., City of Montebello: <ul style="list-style-type: none"> - Please remove project from Project List. • Add RTP ID “120018” - Turnbull Canyon Road (Industry/LA County) on the Project List with the route name and description as stated in our attached letter. It was included in the 2020 RTP/SCS Project List but is not included in the 2024 RTP/SCS Project List. The project cost should now be \$98,106 (\$1,000’s) and the completion date is 2027. 	<p>All updates to RTP IDs #1120015, 1200L002, 1200L004, and 1120018 described in your comment have been applied to the projects. The noted updates do not impact transportation conformity or the PEIR determination and are deemed to have an insignificant effect on the outcomes from Connect SoCal 2024. RTP project ID#1120018 was not included in the Draft Project List Technical Report due to a completion year of 2022, which placed it outside the plan’s range of planned projects.</p>
Submitted by	Sierra Club	Submittal 0001740

ID	COMMENT	RESPONSE
0001740.01	<p>The California Air Resources Board's 2022 Scoping Plan calls for "VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045" (pp. 72, 192-4). But Chapter 5 (pp. 179, 181) makes no reference to the Scoping Plan and only cites a much smaller VMT per capita reduction of 11.4% from base year 2019 to Plan year 2050.</p>	<p>The Scoping Plan, developed by CARB, details how the State will achieve its GHG emission reduction targets. While VMT reduction targets and strategies are included in the Scoping Plan, these targets are not regulatory requirements, but will inform future planning processes. Just as prior Scoping Plans informed the current 19 percent GHG emission reduction target that CARB set for SCAG, CARB may consider the 25 percent VMT reduction target in the 2022 Scoping Plan when setting new GHG emission reductions for SCAG in 2026.</p>
0001740.02	<p>The California Air Resources Board's 2022 Scoping Plan calls for "VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045" (pp. 72, 192-4). But the Performance Monitoring Technical Report (pp. 50-51 and 74-75), makes no reference to the Scoping Plan and only cites a much smaller VMT per capita reduction of 11.4% from base year 2019 to Plan year 2050.</p>	<p>The Scoping Plan, developed by CARB, details how the State will achieve its GHG emission reduction targets. While VMT reduction targets and strategies are included in the Scoping Plan, these targets are not regulatory requirements, but will inform future planning processes. Just as prior Scoping Plans informed the current 19 percent GHG emission reduction target that CARB set for SCAG, CARB may consider the 25 percent VMT reduction target in the 2022 Scoping Plan when setting new GHG emission reductions for SCAG in 2026.</p>
Submitted by	<p>South Bay Cities Council of Governments</p>	<p>Submittal 0001774</p>
0001774.01	<p>Comment: From our review, the strategies and policies described in the document do not accommodate the projects we are implementing in the South Bay subregion. We recommend an amendment, perhaps as a case study in an appendix, that presents a summary of the concepts of the South Bay Sustainability Strategy.</p> <p>We make this request because it is driven by a practical need. Continuation of our innovation implementation process depends on SCAG acknowledging and implicitly endorsing the strategy and policy innovations that we have developed and are now in the process of working with our cities to apply.</p> <p>Our innovation utilizes personal use of micromobility devices for local trips integrating that with digital access for neighborhoods. This will result in greenhouse gas emissions reduction, less congestion on the arterials, more affordable personal transportation options for those that are disadvantaged, and reduction in vehicle miles traveled. Essentially, it addresses all of the state and regional goals. Yet, there is no acknowledgment of the personal use of micromobility devices which are becoming ubiquitous and need safe pathways on which to operate.</p> <p>Similarly, there is no acknowledgment of the connection which integrates bringing digital resources to communities allowing for 'the trip not taken' to be a transportation strategy.</p> <p>While the word 'rolling' has been added to Active Transportation, the definition still hinges on human power. Not recognizing the personal micromobility devices that are on the market at relatively low cost available today at local stores dismisses the viability of these devices to address 70% of the trips in the South Bay which are 3 miles or less. Local trips predominate in other parts of the SCAG region as well.</p>	<p>Comment noted. Connect SoCal envisions a future where transportation is efficient, multimodal and accessible to all. In the future, the region is envisioned to have an abundance of safe, accessible, and connected active transportation options. This vision and the associated strategies identified in Chapter 3 of the Plan and Mobility Technical Report for active transportation, first/last mile connections, and micromobility are supportive of the ongoing efforts in the South Bay, such as the Local Travel Network.</p> <p>In Chapter 3 of the Plan, strategy 77 (Encourage investments that provide access to digital activities that support educational, financial and economic growth) acknowledges the importance of digital access.</p> <p>The Mobility Technical report includes "micromobility" as part of the active transportation definition in section 3.2. SCAG recognizes the growth in micromobility and its support of modal shifts. Connect SoCal includes the following micromobility strategies in Chapter 3.3 of the Plan: "Support implementation of Complete Streets demonstrations (including those addressing curb space management) to accommodate and optimize new technologies and micromobility devices, first/last mile connections to transit and last-mile deliveries." and "Test, deploy and scale new and shared mobility services, including micromobility (e.g., bike share, e-scooters, etc.) and microtransit pilot projects."</p>
0001774.02	<p>From page 24 discussion of priority development areas from the land use/neighborhood references in SoCal Connect:</p> <ul style="list-style-type: none"> •Transit-oriented communities and transit-oriented development are key components of a development pattern that achieves SCAGs VMT/GHG reduction target and melds them into a single inclusive sustainable development pattern. •Promote the growth of origins and destinations in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicle dependency and vehicle miles traveled; <p>Comment: SoCal Connect recognizes only public transit and the forms of active transportation as the legitimate forms of mobility in a sustainability strategy. Transit service is slowly catching up to pre-COVID levels and was actually in decline for several years before the pandemic. Walking and cycling have failed to scale up to levels necessary to address GHG emissions reductions required to avoid tipping points of climate sinks. Recognizing the proliferation of micromobility devices will help reach the goals that current strategies have not been able to.</p>	<p>Comment noted. SCAG recognizes the growth in micromobility and its support of modal shifts. Connect SoCal includes the following micromobility strategies:</p> <p>Support implementation of Complete Streets demonstrations (including those addressing curb space management) to accommodate and optimize new technologies and micromobility devices, first/last mile connections to transit and last-mile deliveries.</p> <p>Test, deploy and scale new and shared mobility services, including micromobility (e.g., bike share, e-scooters, etc.) and microtransit pilot projects</p>

ID	COMMENT	RESPONSE
0001774.03	<p>Another example, the Congestion Management Chapter - page 56 – Active Transportation and First/Last Mile includes no acknowledgement of the new electric low speed vehicles on the market and how they fit into the existing system – for good or bad. The plan is silent.</p> <p>Comment: Either the definition of Active Transportation has to change to allow for slow speed vehicles or a new category needs to be included so that projects addressing the infrastructure for these devices can be funded and properly addressed as part of the transportation system.</p>	<p>Comment noted. SCAG recognizes that electric low-speed vehicles could offer a sustainable solution for first/last mile connectivity. These vehicles can integrate into the existing system, enhancing mobility and bridging gaps between public transit and final destinations. The Mobility Technical report includes "micromobility" as part of the active transportation definition in section 3.2. SCAG recognizes the growth in micromobility and its support of modal shifts. Connect SoCal includes the following micromobility strategies in Chapter 3.3 of the Plan: "Support implementation of Complete Streets demonstrations (including those addressing curb space management) to accommodate and optimize new technologies and micromobility devices, first/last mile connections to transit and last-mile deliveries." and "Test, deploy and scale new and shared mobility services, including micromobility (e.g., bike share, e-scooters, etc.) and microtransit pilot projects."</p>
0001774.04	<p>Additionally, broadband makes its way into the plan mostly as to how it will enhance ITS and the economy. Under Future Workplace (Chapter 3, page 92 - This initiative focuses on the strategies, implementation and impacts of telework and tele-everything as the world shifts to post-pandemic behaviors—through the lens of smart cities and transportation demand management.)</p> <p>Comment: This explanation does not give direction that captures the incredible impact that a digital presence provides. The State is currently working on the adoption of a Digital Equity Plan which is not referenced in this plan. The importance of this is that digital access can make 'the trip not taken' a congestion reliever and reduce vehicle miles traveled. As a matter of fact, the mode share for telework is greater than the mode share for transit riders and yet providing digital access to neighborhoods is not addressed.</p>	<p>Comment noted. In Chapter 2, SCAG acknowledges the vital role of broadband in promoting digital equity, recognizing its potential to facilitate upward social mobility by enabling participation in various digital activities such as telework, telehealth, e-education, and finance. Moreover, SCAG concurs with SBCCOG's perspective that digital practices, notably telework, can potentially reduce Vehicle Miles Travelled (VMT) by offsetting work trips. Connect SoCal includes Regional Planning Policies and Implementation Strategies that support ubiquitous broadband deployment and access.</p> <p>In alignment with the State Digital Equity Plan (SDEP), SCAG has been actively engaged and has contributed significantly to the SDEP. However, and as of this draft and in response to this comment, the SDEP has not been finalized. Additionally, the full impact of other state and federal broadband initiatives, including the State Middle Mile Broadband Initiative and last-mile infrastructure under the IJJA, on VMT and overall digital access remains undetermined. As these projects progress, SCAG plans to expand its discussion on broadband in the 2028 RTP/SS, anticipating a more comprehensive understanding of broadband's benefits by then.</p>
0001774.05	<p>SBCCOG's Innovation Based on Research</p> <p>The SBCCOG has been researching how people get around the South Bay for over 15 years. Survey responses were combined with published data, regression analyses were performed and combined with case studies. The result was the innovative South Bay Sustainability Strategy (SBSS) that was adopted by the SBCCOG Board of Directors in 2010. Adoption was fueled by passage of AB 32 (Global Warming Solutions Act of 2008) and SB 375 (Sustainable Communities and Climate Protection Act of 2008).</p> <p>Adoption was followed by additional research and demonstrations focused on strategy implementation which culminated in a Strategic Growth Council grant to develop the key Chapters of Land Use and Transportation to be included in the Climate Action Plans that SBCCOG prepared for each of our cities and the subregion (LUTCAP). The subregional LUTCAP was adopted by the Board of Directors in 2018. The individual city climate action plans identify programs and policies that implement the strategies, and also model the expected VMT and GHG emission reductions. The SBCCOG LUTCAP resulting from this grant was presented to the Strategic Growth Council staff and accepted with its strategies and implementation methods.</p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
0001774.06	<p data-bbox="191 87 1129 207">Moving Forward The primary means of fostering city implementation available to the SBCCOG is through demonstration projects and in-depth studies. In each case, external funding through state and regional government grants is essential.</p> <p data-bbox="191 228 1129 321">The single most significant criterion when applying for government grants is consistency with SoCal Connect and, in many cases, also the relevant agency master plan. Typically, there is consistency between the region and state agency.</p> <p data-bbox="191 342 1129 488">The SBCCOG has struggled winning some grants because the micromobility and digital access components of the SBSS and its synergistic implementation initiatives are not included in SoCalConnect. Without that, innovations are very slow to get implemented. Inclusion in SoCal Connect opens the door to funding by recognizing these concepts as components of the transportation system.</p> <p data-bbox="191 509 1129 656">There is an urgency to include these revisions in the 2024 SoCal Connect. Predictions by some climate scientists are that the global carbon budget will be depleted at the current rate of emissions perhaps as early as 2030 and no later than 2035. We cannot wait another 4 years to implement these innovations. It is essential that we do not concede to business as usual, and that we try doing different interventions.</p> <p data-bbox="191 656 1129 776">The SBCCOG also asks that micromobility and the 'trip not taken' through digital access be included as key components of a land use and transportation strategy at least recognized in SoCal Connect so that the initiatives and projects that implement the strategy are eligible for funding from federal, state, SCAG and Metro sources.</p> <p data-bbox="191 797 1129 995">SCAG prides itself on developing the SoCal Connect through a bottoms-up process. SBCCOG Board adopted strategy and our Climate Action Plans should establish the credibility needed for inclusion in SCAG's bottoms up process. Most importantly, SCAG holds a long standing position that one size does not fit all. As written, the strategies included in the 2024 SoCal Connect does not include and therefore do not recognize the strategies of the South Bay subregion. We respectfully request that you rectify the omissions identified in the final SoCal Connect policy document.</p>	<p data-bbox="1136 87 2053 147">Comment noted. Please see responses to Comment ID 0001774.01 through 0001774.05 for more details.</p>
Submitted by	Southern California Leadership Council	Submittal 0001744

0001744.01 Please see attached coalition comment letter.

On behalf of the Southern California Business Coalition (“Business Coalition”) and its members that are signatories to this letter, we appreciate this opportunity to both comment on the Draft 2024 Regional Transportation Plan/Sustainable Communities Strategy (“Connect SoCal 2024,” “RTP/SCS,” or the “Draft Plan”) and accompanying program environmental impact report (the “PEIR”), and express our thanks to you and your staff for your collaborative and forthcoming approach to the drafting of these documents. We appreciate that SCAG’s executive leadership and staff have provided our members with many occasions on which to ask questions during the RTP/SCS development process, and to provide our comments and suggestions along the way.

On July 18, 2023, the Business Coalition provided SCAG’s leadership and its Connect SoCal 2024 team with a copy of the policy principles we developed for our use when reviewing and evaluating the Draft Plan. These included:

- Accounts for Technological and Societal Change – that Connect SoCal 2024 should account for the benefits of all recent technological and societal changes, such as ongoing increases in the number of people who work from home, in developing and calculating its GHG and VMT reduction strategies;
- Supports Housing Production – that Connect SoCal 2024 supports the accelerated production of new housing to address the housing crisis, in compliance with recent reforms to state housing laws. Also, Connect SoCal 2024 must be crafted to avoid problems associated with CEQA abuse and so as to assure that projects, to the extent possible, enjoy the benefits of CEQA exemptions and streamlining;
- Respects Local Control – that Connect SoCal 2024 respects local control by giving cities, counties and local transportation agencies appropriate control and flexibility in matters related to land use and transportation;
- Provides Positive Economic Impacts – that Connect SoCal 2024 supports economic growth, encourages job creation and that the Plan include a true cost/benefit analysis that delineates the plan’s positive economic outcomes for the region;
- Applies Appropriate Criteria for New Revenue Sources – that Connect SoCal 2024 ensures that new transportation revenue sources are fair, equitable and economically sound, so that new revenues are drawn fairly and proportionally from those who would benefit from the related transportation infrastructure or improvement; and
- Assures Transparency and Disclosure – that SCAG commits to transparency and disclosure in the drafting, development, and public review of the Draft Plan.

In the same letter, we requested that SCAG prepare and share the results of modeling of a land use scenario that reflects the realization of the local governments’ respective housing elements that are approved, or are pending approval, and reflect the local governments’ planning to accommodate the sixth cycle RHNA process. Although we understand that such modeling was not undertaken, we appreciate that Connect SoCal 2024 modeling does indeed accommodate the 1,341,827 housing units which were required by the current sixth cycle of RHNA.

We are pleased that the Draft Plan largely addresses our policy principles noted above and has resolved most of the concerns that we raised in our meetings with SCAG’s executive leadership and staff during the Plan development process. We therefore write today to express our general support for the Connect SoCal 2024 draft plan, provided that some remaining matters expressed in this letter are satisfactorily addressed in the Final Draft, in the accompanying PEIR as needed, and in SCAG’s planning efforts going forward.

Comment noted. For specific responses to the policy principles outlined, please see responses to Comment ID 0001756.

For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-14 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: <https://scag.ca.gov/peir>

ID	COMMENT	RESPONSE
Submitted by	Southern California Leadership Council	Submittal 0001756
0001756.01	<p>First, we wish to express our appreciation and support for certain elements of the Draft Plan which demonstrate SCAG's efforts to assure that Connect SoCal 2024 will provide tangible economic benefits to the region. Most importantly, we wish to express, as representatives of businesses that are vital to the regional economy, our support for the extensive transportation improvements that are envisioned in the RTP/SCS, which will total a cumulative investment of \$750 billion over the duration of Connect SoCal 2024's term. Our region's transportation network and the aging infrastructure that underpins it are essential to our regional economy. Every constituent and all persons in the SCAG region are dependent on our transportation infrastructure. For the region to become more livable, prosperous, and accessible, transportation investments of the scale indicated in the RTP/SCS are indeed necessary.</p>	Comment noted.
0001756.02	<p>We also wish to express our specific support for the following two transportation-related aspects of the Draft Plan:</p> <p>- Goods Movement: The importance of the Goods Movement & Transportation ("GM&T") sector to Southern California's economy – not to mention the state and national economies – cannot be overstated. The San Pedro Bay Ports handle goods valued at \$1.37 billion a day (\$500 billion annually), and there are more than 307,000 trade-related jobs in Los Angeles County alone. More than any other sector in the region, GM&T creates more high-wage jobs for people who do not have a college education, and as such has provided a path for thousands upon thousands of Southern Californians to achieve long-term financial security.[Footnote 1] We therefore appreciate that the Draft Plan includes \$65 billion in capital expenditures for goods movement projects. Moving forward, we encourage SCAG to pursue pragmatic pathways to keep the Region competitive by meeting the goods movement sector's infrastructure and energy needs in light of State mandates for GHG reductions and the conversion of both fixed and mobile sources to cleaner energy options. We encourage SCAG to lead a regional initiative to research, communicate, and implement policies that will increase a better understanding of the economic importance of our ports and the entire goods movement sector to our region, state, and nation. We look forward to working with SCAG to create opportunities for regionwide communication, coordination, and understanding between businesses, utilities, regulatory agencies and regional planning agencies to better prioritize projects, secure sufficient funding, and increase system-wide integration and efficiencies in support of improved goods movement.</p>	Comment noted.
0001756.03	<p>Express Lanes: We appreciate that the Draft Plan commits to the planning, permitting, funding and building of additional express lanes throughout the region. Express lanes can be effective in the management of travel demand by alleviating congestion and encouraging ridesharing, which helps to reduce GHG emissions. As nearly all future highway expansion projects in the SCAG region will involve the provision of new express lane capacity, one of the most essential roles for SCAG and its member jurisdictions will be to develop a coordinated and strategic approach for the buildout of the region's express lane network. This is particularly important because the response to Senate Bill 743 implementation is still evolving,</p>	<p>Comment noted. As noted in the Mobility Technical Report, SCAG developed a Regional Express Lane Network Concept of Operations initially in 2016 and updated the document in 2021. This document provides a blueprint for integrating individual express lane projects into a regional system by identifying a comprehensive set of interoperability issues that should be addressed as individual express lane projects advance, particularly across county lines.</p>

ID	COMMENT	RESPONSE
0001756.04	<p>Beyond the sections of the Draft Plan directly related to transportation projects, we also support the following elements of the draft:</p> <ul style="list-style-type: none"> - Housing: As noted above, we appreciate that the Draft Plan addresses and accommodates the sixth cycle RHNA requirement of 1.34 million new housing units in the region and includes SCAG's own goal of 1.6 million new housing units regionwide by the horizon year of the plan. We appreciate the various policies and strategies in the Draft Plan that can support greater regional housing production; but, as explained below, we urge SCAG to assume more of a leadership role in efforts to identify and champion development opportunities beyond existing urbanized areas, to include master-planned new towns, new so-called edge communities, and their related infrastructure. We fear that the Draft Plan assumes too much growth within the centers of urbanized areas and around particular transit nodes, which will provide far too limited opportunities for new development, especially affordable new development; and this will in turn constitute a major impediment to meeting the RHNA and SCAG's targets for new housing production. The highly constrained growth pattern that is inherent in the Draft Plan will, if it is not revisited and reasonably relaxed, lead to a continuing and severe shortage of available and affordable housing. The SCAG region will not have the amount of additional housing supply needed to solve the housing affordability crisis unless a larger palette of development opportunities can be realized – one that includes a more balanced typology of new development in addition to redevelopment. As is noted in the Draft Plan (on page 21 of the Economic Impact Analysis technical report), if housing production is not increased, the region's economy will suffer. 	Comment noted.
0001756.05	<p>That said, we appreciate the inclusion of the Housing Technical Report, which provides a good summary of the region's housing challenges and highlights the connectivity between resolution of the housing crisis and sound regional transportation planning. We also appreciate that the Plan anticipates that the region will leverage \$6 billion for critical housing-supportive infrastructure, like water, sewer and electrical utilities, which is essential to spurring housing development across the region. We support both this approach and additional efforts to assure local government has the resources, funding, and flexibility that they need to meet the growing demand for infrastructure maintenance and expansion, as is needed to support and enable housing.</p>	Comment noted.
0001756.06	<ul style="list-style-type: none"> - Workforce Development and Technology: We appreciate the discussion in Chapter Two of the Draft Plan regarding changes to the future of the workplace and SCAG's assumptions regarding continuing increases in telework rates. SCAG must continue to track these trends and incorporate them into their modeling and analysis, because they should cause changes to the assumptions used in modelling VMT for new housing, and the levels of transportation-related GHG emissions. We stated in the policy principles noted above that Connect SoCal 2024 should support economic development and job creation. Accordingly, we appreciate the inclusion of the workforce development policies, and in particular recognition of the need to foster a resilient workforce, especially given the positive cost/benefit analysis and job creation projections that are reflected in the Draft Plan. 	Comment noted.

ID	COMMENT	RESPONSE
0001756.07	<p>Whereas we applaud the Draft Plan as expressed above, the Business Coalition nonetheless has remaining areas of concern, which we believe should be addressed through SCAG's ongoing planning efforts. Specifically, we see the need to better address the following areas of concern:</p> <ul style="list-style-type: none"> - The Need for More Effective Approaches to Increased Housing Production: Simply put, the SCAG region needs a staggering amount of new housing supply added within a short period of time, and we are concerned that the Draft Plan's emphasis on overly-concentrated, transit-oriented and urban-centric infill development will not lead to the amount of housing that is needed, especially affordable housing, if it is not reasonably expanded. SCAG, as the region's planning hub, should strive to make it easier to meet housing supply goals by removing barriers to the development of new towns and master-planned communities, particularly in unincorporated areas of the six counties in the region, where land is available and can be improved more economically when compared to building predominantly in urban centers and near public transit routes. Consequently, we encourage SCAG to undertake a greater leadership role in seeking a better balance between transit-oriented and urban development and, in addition, new development outside of existing urban boundaries. For example, the Draft Plan indicates a projected limitation on such development through 2050 to just 40 square miles throughout the entire 1.8-million-square-mile SCAG region, as stated in the performance measurement tables in Section Five of the Draft Plan. We view this limitation as wildly unrealistic and restrictive, given the economics of housing production, the challenges relating to adding infrastructure, and especially the current massive undersupply of adequate housing for the region's population. SCAG should be championing and pursuing plans that will lead more surely to more housing production throughout the region, especially the development of homes which are more affordable to the working-class Southern Californians who are now priced out of home ownership and denied the significant economic and social benefits it provides. 	<p>Comment noted. The plan encourages infill development through the Priority Development Areas. Priority Development Areas (PDAs) are areas within the SCAG region where future growth can be located in order to help the region reach Plan goals. While the descriptions and data inputs of PDAs generally reflect the principles and targets of Connect SoCal, they are non-binding growth visioning tools. Additionally, they were utilized to assist in developing the preliminary growth forecasts, which were then reviewed by local jurisdictions during the Local Data Exchange which took place between May 2022 and December 2022. Feedback was accepted during this time to modify SCAG's records for priority development areas boundaries; however, following their use as a growth visioning tool, the TAZ-level household and employment growth forecast data provided by local jurisdictions became the basis for the Forecasted Regional Development Pattern.</p> <p>In the Connect SoCal 2024 Forecasted Regional Development Pattern, not all growth is anticipated to occur within the PDAs, which also includes existing Spheres of Influence (SOIs). The Plan reflects anticipated growth both within existing urban areas and in greenfield areas. Further, Connect SoCal 2024 does not "indicate a projected limitation" on development outside of existing urban boundaries. The "Rural Land Consumption" or "Land Conversion To Urban Purposes" performance measure is an estimate of the difference between the growth pattern in Connect SoCal 2024 and historical patterns of development within the region. Because the Connect SoCal 2024 Forecasted Regional Development Pattern is rooted in locally adopted plans and local input, this is a reflection that the local planning within the region is currently less focused on expansion to the rural periphery than it has been historically.</p>
0001756.08	<p>There is ample evidence that the housing typology currently favored by state housing policy and in recent regional housing planning (i.e., as are reflected in Connect SoCal 2024) have inherent associated costs that make adequate housing unattainable for a great many Californians, even if economic incentives and regulatory streamlining are provided. The Turner Center for Housing Innovation at UC Berkeley recently explained the current predicament in its study, Making It Pencil: The Math Behind Housing Development (originally published in 2019 and updated with current market data in December 2023.) [Footnote 2] The study used as its example a 30,000 square foot, 120-unit multistory residential building with 120 parking spaces and 1,500 square feet of first floor retail space. The example assumed a construction type which was a concrete podium first floor (classified under the state's residential building code as "Type 1") and wood frame construction above (classified as "Type 5"), or "five-over-one" construction. Even though their study deliberately ignored the effects of many costs, such as the foreseeable need for environmental study, affordable housing subsidization, demolition costs, infrastructure exactions, and made generously low assumptions about many other costs, the study ultimately found this typology of construction to be largely uneconomical. Specifically, the study states: We found that it has become increasingly difficult to get projects to pencil in many parts of California, including the Bay Area, Sacramento, and Los Angeles. The example case study "deals" we created in 2019 for the most part are no longer financially viable in current market conditions. These changing market conditions help to explain why many typical market-rate multifamily projects are stalling across the state. (p. 2)</p>	<p>Comment noted. SCAG supports programs and policies that promote increased housing supply, choice, and affordability.</p>

ID	COMMENT	RESPONSE
0001756.09	<p>If projects like the one modeled in the study – which are like the projects that Connect SoCal 2024 envisions will be the solution to the state’s housing crisis – cannot pencil out in the areas of the state that have the highest housing costs, they certainly would not be economically viable in the region’s more affordable, non-coastal markets, where many Californians now must look to find affordable housing options. There are places for these types of projects, but the goal of providing ample housing for all our region’s residents will not be met unless a wider variety of housing types is supported by policy, especially that which can foster new housing in non-urban areas, where land costs are lower.</p>	<p>Comment noted. SCAG supports programs and policies that promote increased housing supply, choice, and affordability.</p>
0001756.10	<p>Given how the Turner Center’s study underscores the importance of an understanding the economics of housing to the resolution of the housing crisis, we invite SCAG to study and compare new and developing towns like Valencia (which currently has the highest job-generation rate in the entire SCAG region) with development and redevelopment projects within urban centers and narrowly-defined transit-oriented areas. We believe such a study will show that (1) the amount of public funding required to build or improve the infrastructure needed to support population growth is less for new towns and large master-planned communities, (2) that new towns and large master-planned communities can be as successful as urban developments in the generation of new jobs, if not more so, and that current VMT assumptions should be revised to address the amount of jobs generated by these new developments, (3) that it is more affordable to achieve climate resiliency goals like net zero energy use in new developments than in existing, more developed areas, and (4) that new towns and large master-planned developments can effectively set aside ecologically significant open space and generate funds necessary for the ongoing protection and enhancement of that open space.</p>	<p>While specific development types were not analyzed for the 2024 Plan, Section 7.4 of the Land Use and Communities Technical Report analyzes a variety of co-benefits at the regional level compared to a baseline scenario which follows past growth trends and is comprised of less urban growth and less compact growth. SCAG’s Scenario Planning Model (SPM) results indicate that energy and water use, transportation infrastructure costs, household transportation costs and other measures perform better in the Plan scenario compared to this alternative.</p> <p>Additionally, a small amount of sketch planning analysis was conducted in response to a request to increase growth in certain large developments in northern LA county and is described further in the response to comment 0001684.01. In short, the addition of a large amount of jobs and housing on the urban fringe and further from a range of destinations did increase VMT/capita compared to a more compact growth alternative; however, the magnitude of the increase was lower in a scenario where better jobs-housing balance was maintained in the project area. The Turner Center study referenced uses an econometric model to gauge whether 4 hypothetical multifamily developments (San Francisco area, San Jose area, Sacramento, and West Los Angeles) would “pencil out,” i.e. cross conventional thresholds for economic feasibility. None of the developments crossed this threshold; however, changes to parking, permitting, and density regulations would result in the West Los Angeles example becoming financially feasible. Further assessment of multifamily and other development types including master-planned communities in a wider range of places across Southern California be considered early in the development process of the 2028 Plan.</p>
0001756.11.1	<p>Include Clear Limitations on the Prescriptiveness of the RTP/SCS: We appreciate that the Draft Plan’s Demographics and Growth Forecast Technical Report (the “Growth Technical Report”) explains that SCAG’s technical, demographic growth modeling and mapping using transportation analysis zones (TAZs) should not be misinterpreted as being unduly prescriptive or prejudicial. Specifically, such text within the Draft Plan is found in the Growth Technical Report at page 45, which is labeled “5.5 TAZ-Level Growth Forecast, Growth Vision, and SCS Consistency,” and in footnote 3 on page 54. We believe that such helpful and important text should be significantly expanded upon and relocated to within the text of the Connect SoCal 2024 document itself, and be reflected in SCAG’s responses to comments in the final PEIR, rather than being relegated, as it is now, to only an accompanying report and a footnote.</p>	<p>SCAG has included a note in Connect SoCal 2024, as such: "Note: The development patterns shown are based on Transportation Analysis Zone (TAZ) level data. Household and employment growth projection data at the jurisdiction level or smaller geography , including TAZ, are utilized (i) to conduct required modeling analysis and (ii) to generally illustrate how regional policies and strategies may be reflected at the neighborhood level. As such these data and maps are advisory and non-binding."</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-14 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>

ID	COMMENT	RESPONSE
0001756.11.2	More specifically, we urge SCAG to include within the final Connect SoCal 2024, and reflect in the PEIR, the alternative text that is recommended in comments submitted by the Orange County Council of Government ("OCCOG").	<p>SCAG has included a note on maps with Transportation Analysis Zones (TAZ): "Note: The development patterns shown are based on Transportation Analysis Zone (TAZ) level data. Household and employment growth projection data at the jurisdiction level or smaller geography, including TAZ, are utilized (i) to conduct required modeling analysis and (ii) to generally illustrate how regional policies and strategies may be reflected at the neighborhood level. As such these data and maps are advisory and non-binding."</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-14 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001756.12	As Connect SoCal 2024 was developed over time, our Business Coalition has endeavored to follow the excellent work of SCAG's staff and the thoughtful input from its Technical Working Group and the COGs within the region. The investment of time we made in understanding their work has greatly benefitted us as we analyzed the Draft Plan. In particular, we would like to draw your attention to the exhaustive review by OCCOG of the Draft Plan and the PEIR, which we understand will be included in their comment letter. We have reviewed this work and their recommendations to SCAG; and we believe the inclusion and reflection of the OCCOG's work in the final Connect SoCal 2024 will enhance and improve it.	<p>Comment noted.</p> <p>For responses to the Orange County Council of Governments (OCCOG) comments, please see comment IDs: 0001766, 0001777, 0001778, 0001779, 0001780, 0001781 001782 0001783, 0001784, 0001785, 0001786, 0001787, 0001788, 0001798, 0001790, 0001791, 001792.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-14 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001756.13	In summation, we wish to emphasize that the Business Coalition embraces the Draft Plan's vision of a Southern California region that is more livable, prosperous, and accessible than it is today. Beyond the potential adoption of this plan, we look forward to working with SCAG on an expanded vision for the region that not only achieves important environmental and economic goals, but also provides the tools to foster the volume of housing production that is so desperately needed.	Comment noted.
0001756.14	Finally, we appreciate the tremendous amount of time and effort that SCAG's staff and leadership have put into this plan, and we further appreciate the opportunities for input and engagement that were afforded to the business community and other stakeholders throughout the 2024 RTP/SCS development process. Please let us know if you have any questions regarding our comments, concerns, and recommendations as outlined in this letter and we look forward to working with you to assure a Final Connect SoCal 2024 that strengthens our region and enhances the quality of life for all Southern Californians.	Comment noted.
Submitted by	Southern California Regional Rail Authority	Submittal 0001769
0001769.01	As the operator of the Metrolink regional passenger rail system in Southern California, the Southern California Regional Rail Authority (Metrolink) appreciates the opportunity to comment on Connect SoCal 2024, the Southern California Association of Governments' (SCAG) draft Regional Transportation Plan / Sustainable Communities Strategy. We have divided our comments into those pertaining to the Mobility Technical Report and those on the general Connect SoCal 2024 plan.	Comment noted.

ID	COMMENT	RESPONSE
0001769.02	<p>The Mobility Technical Report includes a thorough and laudable exploration of active transportation, streets, and highway plans and projects, and Metrolink suggests the Rail/Transit chapter could be similarly strengthened. Metrolink recommends the Connect SoCal 2024 plan include a more rigorous discussion of the region's transit systems' outstanding capital and maintenance needs. Transit Asset Management Plans (TAM) can be cited to better determine regional needs. For example, Metrolink's TAM Plan, published in 2022, evaluates construction costs, condition assessments, and backlog totals for our system. Our TAM Plan specifically identifies rolling stock, trackwork, and systems/train control as being the largest, and among the most critical, needs. Metrolink's 2023 Metrolink Rehabilitation Plan draft report further quantifies these needs, estimating an existing backlog of \$780.43 million (2023\$), with annual state of good repair (SOGR) costs averaging \$121.97 million (2023\$) for the next 25 years. It is important to note that the SOGR funding deficit is structural in nature under current federal and state funding mechanisms and will not improve or cure unless there is change to how these repairs are funded.</p> <p>SOGR projects are vital for the safe and reliable operation of transit services and help passenger railroads attract and retain customers. When unaddressed, maintenance backlogs often result in emergency repairs, which can be upwards of six times more costly than capitalized maintenance. These repairs also negatively impact service reliability, which is consistently cited as among the most important factors needed to regain, retain, and increase ridership lost due to the COVID-19 pandemic. Adding specificity about the regional transit and rail network's unfunded needs to the Mobility Technical Report will help policymakers and stakeholders better understand the level of investment required to meet ambitious greenhouse gas reduction goals, foster mobility, and support economic competitiveness as outlined in other parts of Connect SoCal 2024.</p>	<p>Comment noted. The Transit Asset Management (TAM) plans of SCAG region operators including Metrolink were reviewed in the development of the TAM targets for Connect SoCal, and the TAM plans are incorporated by reference into Connect SoCal by way of Appendix 6 to the Mobility Technical Report. While the TAM requirements and State of Good Repair (SOGR) are discussed in the Mobility Technical Report, the investment needs for the transit/rail backlog, including from Metrolink, are addressed in the Transportation Finance Technical Report. The draft Connect SoCal 2024 includes over \$87 billion in passenger rail investments over the life of the Plan. See the Transportation Finance Technical Report for final investment amounts.</p>
0001769.03	<p>The Mobility Technical Report should also include an exploration of Metrolink's transition from commuter to regional rail service. As the agency seeks to recover ridership in the aftermath of the COVID-19 pandemic, a reconsideration of how our network meets the needs of our customers is needed. More frequent, all-day service that connects the entire region – rather than the suburbs with downtown LA during commuting hours only – will foster mobility, meet greenhouse gas reduction goals, and help Metrolink earn back riders. Metrolink's Strategic Business Plan explores this transition with its discussion of enhancing off-peak service and delivering SCORE projects that will increase train frequency.</p> <p>Additionally, the Mobility Technical Report touches on High-Speed Rail and Brightline West but lacks a comprehensive discussion of the related necessary infrastructure investments at legacy stations. We encourage SCAG to acknowledge both the Rancho Cucamonga station enhancements as well as the extensive improvements to LA Union Station that will be required to ready our system for high-speed rail in the next decade and beyond.</p> <p>Metrolink also requests a few corrections related to ridership recovery data cited in the report. Page 7 erroneously states Metrolink ridership is "currently 57 percent lower than it was pre-pandemic at this time." As of November 2023, Metrolink had recovered 57 percent of pre-pandemic ridership levels. Relatedly, page 56 should be modified to note that Metrolink is now carrying "approximately 24,000 boardings per day." Finally, Table 2.3 – Transit Asset Management Targets – should be modified. Metrolink's rolling stock target of .4% should be replaced with 2%.</p>	<p>SCAG is including language in the Mobility Technical Report describing Metrolink's efforts to adapt its service to meet the changing demands of its customers. SCAG is updating the references to Metrolink's data on ridership recovery and TAM targets.</p> <p>While Link Union Station is addressed in the Mobility Technical Report, SCAG is awaiting further developments on the station plans for Brightline West.</p>

ID	COMMENT	RESPONSE
0001769.04	<p>Comments on Connect SoCal 2024</p> <p>Rail and bus operators face different operational and infrastructure needs and goals. We encourage SCAG to differentiate between bus and rail in the implementation section. We suggest that the final plan acknowledge these differences and bifurcate the strategies associated with them to more comprehensively plan for regional mobility in the coming years.</p> <p>We believe the final iteration of the Connect SoCal 2024 should also address and quantify the cost of the clean energy transition beyond zero-emission bus fleets. Development and deployment of zero-emission heavy rail technology to meet the California Air Resource Board's In-Use Locomotive Emission Regulation, the nation's most stringent, and other sustainability thresholds will require new funding sources and collaboration among stakeholders. The final SCAG plan also provides a unique opportunity to engage in a robust discussion about the 2028 Olympic Games. The Games present a generational opportunity to permanently change travel patterns, improve regional mobility, and support long-term sustainability. For example, Metrolink's Southern California Optimized Rail Expansion (SCORE) program will not only upgrade Metrolink's system in time for the millions of visitors in 2028, but improved safety and added service will foster better access to jobs and housing for our residents for decades to come. Once completed, the \$10 billion in SCORE investments will support bi-directional passenger rail service every 30 minutes throughout the entire day. A more thorough exploration of the nexus between 2028 Olympics preparation and the long-term shifts in regional mobility could be detailed in the final Connect SoCal 2024 plan to highlight and justify investment in one to benefit the other. Further, the discussion of the Olympics should acknowledge the fact that many of the projects needed to prepare the region for the Games, to improve air quality and add transit capacity remain unfunded. As of December 2023, Metrolink has a \$7.6 billion funding gap in its \$10 billion SCORE Program. Consequentially, some of the benefits of SCORE will remain unrealized if support from local, state, and federal partners is not secured. Metrolink encourages SCAG to specifically reference to the Mobility Technical Report's FTIP in Connect SoCal 2024 for those interested in learning more about specific unfunded project needs.</p>	<p>Comment noted. The development of regional Transit Asset Management (TAM) targets (detailed in the Mobility Technical Report's Transit/Rail Chapter) included consideration of the CARB Innovative Clean Transit (ICT) regulation (Cal. Code Regs. Tit. 13 § 2023.1), which requires all transit agencies to transition to 100 percent zero emission bus (ZEB) fleets by 2040. Transit investments in the Plan incorporate consideration of and support for clean transportation for both transit and rail. The Mobility Technical Report details the region's transition to clean transit/rail, including Metrolink, in the System Preservation/Resilience discussion beginning on p. 83.</p> <p>SCAG's Clean Transportation Compendium (see: https://scag.ca.gov/post/clean-technology-compendium) is a resource for technology users, both public and private, who are faced with procurement and investment decisions, including for transit/rail operators. It is intended to function as a guiding tool for public agencies and local municipalities in establishing policies that foster the adoption and support of these technologies.</p> <p>Though planning for the Olympics is still in its early stages, SCAG is updating the Mobility Technical Report to reference their impact.</p>
0001769.05	<p>Finally, the LINK US Project at Los Angeles' Union Station is a linchpin for successful transit and rail in the region. Metrolink encourages SCAG to consider including the project in Section 2.16.1, Regional Projects to underscore the importance of the completed investments in fostering regional mobility and economic competitiveness.</p> <p>I sincerely appreciate the opportunity to comment on SCAG's Connect SoCal 2024 plan, and for your consideration of these comments. Questions regarding this letter may be directed to Jeff Dunn, Director, Government & Community Relations, at dunnj@scrra.net or 213.452.0369.</p>	<p>SCAG is updating the Mobility Technical Report's Section 2.16.1 to include reference to the LINK US project.</p>
Submitted by	The Robert Redford Conservancy for Southern California Sustainability	Submittal 0001757
0001757.01.1	<p>January 12, 2024</p> <p>Dear SCAG,</p> <p>Thank you for this opportunity to comment upon Connect SoCal. I write as a lifelong Los Angeles County resident. For the past twenty years, my professional and scholarly work has focused on the Inland Empire—on San Bernardino and Riverside Counties. I have a special interest in logistics, warehouse environmental impacts, and the ports, as well as in public health, environmental, agricultural, and climate issues. I am embedded in a major mapping project of the region as well as in teaching, learning, and research around climate resilience and multiple forms of planetary crisis (biodiversity loss, toxicity, waste, ocean health, etc.).</p>	Comment noted.

ID	COMMENT	RESPONSE
0001757.01.2	As a beginning note, I wanted to flag that the appropriate document to comment upon was difficult to find. I spent most of my time reading through the Connect SoCal Plan and technical reports, rather than the PEIR, because I thought the Connect SoCal Plan and associated documents were the targets for comment. I saw the PEIR only yesterday, as it was located on a sidebar of the website rather than a direct link in the request for comments. This was confusing and has limited my ability to produce CEQA-specific commentary. My hope is that these comments will be applicable regardless. I wanted to flag this in particular because, if I had issues figuring this out, likely other commenters did as well.	For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-10 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir
0001757.02	In terms of climate change, last year was the hottest year on record. This year is predicted to exceed that. Our ocean is warming at twice the rate of other regions due to a particular geographic phenomenon known as upwelling. Immediate-term change with a 2030 target is imperative if we are to have any chance at all of not triggering multiple tipping points that will irrevocably change our lives and create cascading climate impacts. 2030 itself might be too late—and 2050 is unimaginably so from a climate perspective. We need to do all we can as a region in the immediate term in order to plan for and respond to climate change. SoCal Connect has many opportunities to be part of that imperative, but doesn't go far enough. Some additional ideas are outlined in what follows, which treats the relationship between Connect SoCal and Greenprint Data, notions of Consultation and Community input, Goods Movement issues and climate change, preservation of Farmland and Open Land and their need for an analysis of carrying capacity of the region for the Goods Movement. More broadly, I ask that SCAG recheck assumptions about population growth and consider scenarios of economic reshoring.	Comment noted.
0001757.03	I am also requesting an articulation and/or plan for dealing with the fact that some aspects of the plan are in clear conflict with one another.	Connect SoCal 2024 is a long-range Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS) that covers the diverse region of Southern California, including six counties, 191 cities and over 38,000 square miles. The projects, programs, policies and strategies included in Connect SoCal 2024 are intended to support the collective regional vision while still allowing each community the ability to pursue the specific policies or projects that best suite their needs and context. There is no "one-size-fits-all" approach included in Connect SoCal 2024, which may appear as internal conflict. However, SCAG's performance measurement and equity analysis, discussed in Chapter 5 and in further detail within the Technical Reports, are conducted at a regional level to ensure that the Plan, as a whole, is meeting federal and state requirements and regional goals.
0001757.04	SCAG is responsible for convening "local governments and agencies to address regional transportation, land use, and other issues of mutual concern" and its mission is to "foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing and promoting best practices." Values of openness, leadership by example, impact, and courage are excellent aspirational goals that both underpin and need development within the Connect SoCal Plan.	Comment noted.

ID	COMMENT	RESPONSE
0001757.05	<p>Connect SoCal and Greenprint Data</p> <p>Upon first reading through the Connect SoCal document, I was reminded of SCAG's years' long delay of the SoCal Greenprint Dataset, which I understand will go to Council Feb 1, albeit in a truncated form. The delay and limitations around it are truly a loss, as the full Greenprint at this pivotal time in history would have created opportunities for spatially-driven data analysis to determine the scope of problems, appropriate or problematic land uses, and strategies for solutions in Connect SoCal. SCAG's difficulty in navigating multiple political pressures in order to move forward with these materials has been a loss to Southern California communities during this planning process of Connect SoCal, especially as our near future is impacted by extreme weather as well as localized patterns of unchecked environmental injustice. Regional planning without the excellent dataset that was tailor made for our region is at best a lost opportunity and at worst a violation of the public trust. As a longtime supporter of the SoCal Greenprint, I have been disheartened with the divorce of the dataset from the RAMP (Regional Advance Mitigation Plan) as well as the desire to suppress justice and equity layers or ruling out the use of terms such as "the best available science."</p>	Comment noted.
0001757.06	<p>My concern is this: If Connect SoCal's discussions of development, equity, open and working land conservation, biodiversity, water health, tree canopy, climate vulnerabilities and more did not use the best available data due to political interference (ie. the BIA – Building Industry Association, BizFed, and the Southern California Leadership Council), that is a potential interference in the CEQA process for Connect SoCal. It has limited data transparency and also a potential misuse of public funds. That is clearly a broader problem with the Greenprint's history within SCAG but it also impacts this PEIR directly.</p> <p>The highly politicized process with the SoCal Greenprint colored my reading of Connect SoCal. It made me question the framing language of the document around innovation, transparency, justice, equity, climate, information sharing, and community engagement. Though much of the document reads well on paper, some of it rang hollow, in part due to the suppression of the Greenprint from the public eye. The problem is that the public has been denied access to the data and the ability to use these data in order to understand the region's issues as presented in Connect, which has minimized our ability to join in the discussion in meaningful ways. Indeed, publicly available Greenprint data might have allowed a more significant, informed, and meaningful community engagement process on the part of everyone from municipalities to nonprofits to environmental organizations. I also want to recognize SCAG staff who have clearly worked hard on this document whose work on Connect So Cal might have benefited by this robust dataset had it been available in full and in its public form.</p>	<p>Comment noted. The SoCal Greenprint Data Standards were approved by SCAG's Regional Council on February 1, 2024. SCAG will be developing the web mapping application, consistent with the Connect SoCal 2020 PEIR mitigation measures, as well as the Draft Connect SoCal 2024 PEIR mitigation measures (if adopted).</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to responses to ORG 10-3 and SUB 1-46 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
0001757.07	<p>Consultation and Community Input</p> <p>At various points in the document, the word "consultation" is used. In terms of community engagement processes, consultation is on the weaker end of the spectrum of engagement. True community engagement would involve a cultural shift at SCAG that I encourage you to build into Connect SoCal as an aspirational goal. Establishing specific metrics for involvement would be important and fall in line with best practices as well as SB 1000. Even though SCAG is not a government agency, Connect SoCal articulates a desire for meaningful community and stakeholder engagement. Because SCAG leads government agencies, it also has the ability to incentivize, train about, and encourage momentum around compliance with SB 1000 among local municipalities. I ask that these goals be included in the form of true community engagement for the region.</p>	Comment noted. Consultation, as defined within the 2017 Regional Transportation Plan Guidelines for Metropolitan Planning Organization, is a regulatory process that SCAG is required to undertake. Beyond regulatory requirements, SCAG aims to facilitate inclusive and meaningful engagement with diverse stakeholders to produce plans that are effective and responsive to community needs. As such, SCAG continues to explore ways to thoughtfully engage with various local, regional, state, and federal stakeholders, as well as communities in the region.

ID	COMMENT	RESPONSE
0001757.08	<p>Community-engaged planning is critical in disadvantaged communities and environmental justice communities that are already impacted by locally unwanted land uses, many of which are noted in the Plan. This is in part because:</p> <ul style="list-style-type: none"> • Historic inequities and the siting of toxic facilities in proximity to DACs and EJ communities have decreased land values, leading to intergenerational cycles of detrimental project siting. • Evaluating individual projects within individual municipalities puts collective and regional impact and planning on the back burner. A single project generally has a much broader impact than the parcel of land where it is built, joining with other past, present and future projects. Corporate capital and developer influence have shifted the loyalties of local decision makers away from residents, despite vocal opposition to health or environmental detriments that are deemed "significant and unavoidable." But community members experience their lives, regions, and neighborhoods holistically, thus providing an important lens to view any specific project. • Community voice is easily tokenized, ignored, or coopted by the current planning process, resulting in box checking and lack of democratic engagement. 	<p>Comment noted. SCAG acknowledges the diverse and nuanced experiences within the region and are familiar with the challenges that come with meaningful engagement in regional planning. During the development of Connect SoCal 2024, SCAG partnered with 16 community-based organizations to seek direct feedback from historically underrepresented communities and to try move toward meaningful community participation. Additional information on the equity analysis of the Plan is available in the Equity Analysis Technical Report.</p>
0001757.09	<p>Regional planning and support of community-led planning by SCAG is badly needed. In terms of Connect SoCal, meaningful community-engagement is important because community members are intimately tied to neighborhoods and understand the potential impacts of projects, the specific problems they face, and potential solutions better than anyone. Residents have unique insights into sustainable planning for long-term success and quality of life. Considering community members as experts in full collaboration should be named and prioritized in Connect SoCal even if this model has not been used in the development of the plan. A stated goal to help municipalities move from consultation to collaboration and, eventually, community control would be appropriate, for example.</p>	<p>Comment noted. SCAG acknowledges the diverse and nuanced experiences within the region and are familiar with the challenges that come with meaningful engagement in regional planning. During the development of Connect SoCal 2024, SCAG partnered with 16 community-based organizations to seek direct feedback from historically underrepresented communities and to try move toward meaningful community participation. More information on community partnership program is available in the Public Participation and Consultation Technical Report.</p>
0001757.10	<p>Goods Movement—Climate change, Trade Loss Scenarios, and Reshoring of the Economy The technical document about Goods Movement needs to consider climate change among the other supply chain challenges listed. Right now, the Goods Movement technical report references COVID-19, security issues, labor issues, and changing supply chain dynamics. A major omission among these is climate change, which will massively impact our home ports and ocean resources, and those of our trading partners, who will also be facing increased drought, heat, flooding, monsoons, typhoons, wildfires, and storm surges. SCAG projections predict triple the growth of TEUs entering the ports by 2035. But it's also important to consider opposite: trade-loss scenarios due to strategic choice and/or the following:</p> <ul style="list-style-type: none"> • Some of the most critical port infrastructure globally exhibits low climate planning and high climate vulnerability; Asian ports are extremely vulnerable to sea level rise and flooding, which will impact Southern California imports and thus its economic role. Some of the below is contained in a report about partner port climate vulnerability we recently conducted if you wish further information. • Major changes to the viability of shipping routes will occur within the next 5-10 years due to climate change: The Panama Canal may become compromised due to lack of freshwater resources; US Gulf and Eastern ports within the US may become compromised; the Arctic is projected to be ice free by 2030 and will likely open as a shipping corridor, which will shift global trade routes; maritime chokepoints for food and goods need further assessment. • Rapidly changing climatic conditions, more frequent and intense storms, feedback loops leading to increased atmospheric and oceanic warming, and sea level rise will create different impacts around the globe. The next five to ten years will increase the severity and duration of disruptions to global trade to and from Southern California, particularly impacting low-lying Asian port infrastructure especially in China, Japan, Korea, and surrounding populations. Our own ports are also at risk, though less so. These vulnerabilities will combine with additional disruptions, such as those experienced during the pandemic, as well as changing policies, tariffs, and security issues that are outlined already in Connect SoCal. 	<p>Comment noted. Through upcoming studies and programs, SCAG will be focusing on a comprehensive sustainable freight plan update, which will be incorporated into future updates of Connect SoCal.</p>

ID	COMMENT	RESPONSE
0001757.11	<p>The Intergovernmental Panel on Climate Change (IPCC) reports “widespread, rapid, intensifying” challenges—in other words, our changing climate is producing faster and more intense warming patterns and disaster impacts than previously anticipated (IPCC 2021). Maritime communities have recognized the need to collaborate around climate issues, forming groups such as the World Port Sustainability Program, World Port Climate Action Program, and the Just Transition Maritime Task Force (IAPH 2018, IAPH 2023, MJTTF 2022). In addition, several reports have been published regarding shipping vulnerabilities due to tropical storms, ocean warming, and sea level rise due to the melting of the polar ice sheets. The periodic, paced, and semi-manageable disruptions of today will follow the same pattern as climate change, leading to increasingly rapid cycles of intense flooding, fire, and drought at many of our trading partner ports. Planning for these impacts is imperative. Connect SoCal needs to project and plan for what the goods movement may become in the next decades due to climate challenges. These need to be treated explicitly in the Goods Movement plan and might be considered in the following ways within Connect SoCal projections:</p> <ul style="list-style-type: none"> • Assess trade relationships and port infrastructure through a climate lens. • Assess the climate vulnerability of maritime chokepoints and how they will impact the SoCal region, the viability of our region, our ability to get food and goods, and our quality of life; plans for if these things are compromised. • Assess the impact of possible compromise or loss of the Panama Canal and Asian, Gulf, and Eastern Seaboard ports and the opening of the Arctic on Southern California trade and transportation. • Develop tiered trade-loss scenarios as part of intentional long-term climate vulnerability planning; assessing what portion of port imports and exports can be relocalized or reshored for and by SoCal residents. • Assess how Southern California can help to benefit from economic relocalization/reshoring in terms of its transportation plan, equity and employment opportunities. • Consider SCAG’s role in protecting ocean resources such as kelp and whales, which are both massive carbon sinks. There is more to say here, but I’ll leave it there for now. 	<p>Comment noted. Through upcoming studies and programs, SCAG will be focusing on a comprehensive sustainable freight plan update, which will be incorporated into future updates of Connect SoCal.</p>
0001757.12	<p>Opportunities to reshore the economy, to minimize emissions, and to create resilience and self-reliance are major missing pieces in Connect SoCal. Targeted (or even beginning) analysis or at least a mention of trade-loss scenarios and what it might mean to transition to a more localized economy is critically important, given that the instability of supply chains will increase in the coming years. This falls squarely into SCAG’s mandate to consider discussion of regional goods movement systems, including seaports, rail, air cargo and trucking—and their relationships to industrial and retail facilities; global and national supply chains; local and national consumption; regulatory frameworks; technology transitions and community impacts.” Just as SCAG is invested in land-based resources, so too should it be invested in working with government agencies to protect ocean-based resources.</p> <p>Economic reshoring is a double win because of the decrease in emissions and pollutants, that also exacerbate and/or reduce contributions and/or impacts to climate change. It’s a triple win when considering associated opportunities for green, high road job creation. Automation and AI will likely facilitate economic reshoring, but SCAG should be thinking of setting guardrails around automation and AI by establishing expertise and leadership around this.</p>	<p>Comment noted. Assessment of trade loss has been considered as a part of the Goods Movement Technical Report with respect to shifts in containerized cargo to the Gulf and East coast ports versus Southern California, as well as the correlation in industrial development occurring outside of Southern California in areas throughout the U.S. supporting increased containerized trade volumes. The Goods Movement Technical Report also provides context with respect to shifting localized consumption through e-commerce and omnichannel shifts and industrial development trends and considers these implications across all freight modes of the goods movement system.</p>

ID	COMMENT	RESPONSE
0001757.13	<p>Preservation of Farmland and Open Land</p> <p>I greatly appreciated reading about the importance of preserving farmland and open land for nature-based solutions to climate change and to improving equity and quality of life. The problem is that some of the goals of Connect SoCal are in conflict with one another on the ground. The plan doesn't address how these conflicting goals will be approached simultaneously without cancelling each other out. For example, prioritization of goods movement will mean continued loss of open and working lands particularly within the Inland Empire and increasingly into the desert. Building housing also may compromise land conservation—and while the plan for infill is a clear priority in Connect SoCal, the goods movement shares no parallel plan or else it will continue to take up remaining open and working lands. As the report notes, open and working land is critical as a nature-based solution to climate change.</p> <p>[image] Imperial County is currently the center of agriculture in the region and has already reached 1.5 degrees of warming—the highest of any SCAG county. This year will likely exceed those measures. This is cause for alarm that should be noted in the document. The point is that we cannot give up on local agriculture; in fact, we need to calculate whether we can feed ourselves. As noted above, at some point we may be faced with supply chain breakdowns that compromise our food supply, as well as drought, flood, and land loss and food production problems within the central valley. In terms of projections to 2050, determining the percentage of our ability to feed ourselves through ocean and land resources should be at least mentioned in Connect SoCal.</p> <p>Farmland is important to conserve because it is also an untapped resource for the production of energy through agrivoltaics.</p>	<p>Comment noted.</p> <p>The Goods Movement Technical Report includes industrial development information including county-level oriented information and also incorporates policies and strategies to enable goods movement to achieve a sustainable path for the future.</p> <p>Broader resilience considerations are also woven into the narrative, policies, implementation strategies, and technical reports. Additionally, the overall Growth Vision identifies a growth pattern that prioritizes growth within Priority Development Areas (PDAs) and minimizes growth within Green Region Resource Areas (GRRAs). Through collaboration with local partners throughout the region implementation strategies and Regional Strategic Investments can lead to further improvements in conserving both natural and farm lands that are critical for regional sustainability.</p>
0001757.14	<p>[image] There is a need for transparency and further data related to the role of the goods movement in the graphic “Consuming Our Resources” at left. The graphic states that 90,000 acres of natural and working lands have been lost in the past 10 years in order to “support the growth of our communities.” The “growth of our communities” implies housing, and perhaps jobs, but is misleading for several reasons. First, significant amounts of agricultural land and farmland have been lost to industrial development in addition to housing—in particular to the goods movement and warehousing. This is particularly true within the Inland Empire, where land loss has come at a fairly even split between residential and industrial uses, with industrial uses now taking up over 60 square miles of land.</p> <p>I would like to request that this statistic on land loss be broken out, by county, and between at least three land use types, including residential, industrial and commercial uses.</p>	<p>The graphic has been updated to align with discussion on farmland and natural lands preservation in the Land Use and Communities Technical Report. The Goods Movement Technical Report provides industrial development information for the SCAG region, including county-level breakdowns.</p>

ID	COMMENT	RESPONSE
0001757.15	<p>The statement “for the growth of our communities” is also misleading in multiple additional ways:</p> <ul style="list-style-type: none"> • Significant outsider ownership of warehousing. SoCal municipalities have ceded significant amounts of land to outsider ownership, eroding our own sense of sovereignty either between counties (overwhelming ownership of IE warehouses by OC developers) or outside of the State of California. This phenomenon also bleeds profits from warehouse heavy regions, meaning that local communities see more harm than benefit for this kind of land use • The utilization of land to service the needs of the broader United States in addition to (and largely instead of) local SCAG counties. Your own reporting emphasizes that most of the goods that enter the ports of LA and Long Beach leave the SCAG region and the state of California. Thus, undue amounts of land are being sacrificed to a purpose that is explicitly not for our communities; • The document rightly points out that housing is a critical piece. But industrial uses have also demolished housing—particularly in low-income communities of color within the Inland Empire. Rezoning land from residential to industrial is a clear trend and the demolition of housing is growing more common. Much of the land loss has come at a clear detriment to communities and with significant community opposition. SCAG should provide leadership to eliminate the practice of rezoning from residential and open lands to industrial and develop appropriate kinds of infill industrial development where appropriate. We have some data on this if it is of interest. 	<p>Comment noted. As stated, the Goods Movement Technical Report provides information on industrial development for the SCAG region, and at a county-level breakdown. Historically, trends have illustrated a majority of goods going through the SCAG region to other parts of the nation. More recent trends suggest that localized consumption is becoming an increasingly higher proportion. This is noted through the Goods Movement Technical Report as many larger industrial facilities support retail/wholesale local consumption throughout Southern California.</p> <p>The Land Use and Communities Technical report indicates the importance of preserving natural lands, while offering strategies for infill development. Further research will be necessary to understand the implications Connect SoCal can offer on discouraging rezoning from housing to industrial.</p>
0001757.16	<p>Without breaking down land loss data to the public, the public does not have a chance to comment upon this role of industrial development that takes from local populations to benefit non local populations during a time of housing crisis. Though the jobs might be said to provide community benefit, there are multiple problems with warehouse jobs, which have grown exponentially while the Inland region remains locked into cycles of low education and poverty (see Region in Crisis report).</p> <p>I request that SCAG present numbers and statistics by county for land loss according to residential, commercial, and industrial categories, as the story of land loss is incomplete without them.</p>	<p>Comment noted. The Goods Movement Technical Report provides information about industrial development for the SCAG region, including county-level breakdowns. Section 7.4 of the Land Use and Communities Technical Report provides additional breakdowns by development intensity and intraregional location. In addition, the graphic titled “Consuming Our Resources” has been updated to align with discussion on farmland and natural lands preservation in the Land Use and Communities Technical Report.</p>
0001757.17	<p>The Carrying Capacity of the Region for Goods Movement. SCAG should include in Connect SoCal an analysis of the carrying capacity of the region for heavy duty trucks and warehouses that focuses on land coverage, roadway conditions, congestion, and the cost of truck-related roadway repairs. Peripherally, this could form the basis of a broader cost-benefit analysis that examines land use, light, noise, health impacts, and economy of the logistics sprawl of the goods movement sector</p>	<p>Comment noted. Through upcoming studies and programs, SCAG will be focusing on a comprehensive sustainable freight plan update, which will be incorporated into future updates of Connect SoCal.</p>
0001757.18.1	<p>The nexus of land use and transportation is well laid out in the document for housing and residential sprawl, but remains untouched regarding industrial land use and logistics sprawl, which is not looked at critically in Connect SoCal.</p>	<p>Comment noted.</p>
0001757.18.2	<p>Industrial uses such as warehouses that benefit non-SCAG and non-California populations are taking up an increasing share our limited resources of not just land, but energy and water. They create harms to SCAG populations in the form of GHG emissions, poor air quality, congestion, roadway and infrastructural damage, low-wage (and increasingly automated) employment, light, noise, and heat.</p>	<p>Comment noted. The Goods Movement Technical Report provides information regarding industrial uses in Southern California, including shifting containerized trade to Gulf and East Coast seaports, changing industrial developments across Southern California and other states across the U.S., reshoring and near-shoring relationships throughout North America, and localized increasing consumption and production dynamics, all which are driving factors for the SCAG region industrial developments and uses. The Technical Report also discusses freight related transportation system operations and maintenance need, community impacts and equity concerns, and resilience. Through upcoming studies and programs, SCAG will be focusing on a comprehensive sustainable freight plan update, which will be incorporated into future updates of Connect SoCal.</p>

ID	COMMENT	RESPONSE
0001757.18.3	Right now, the unstated assumption within Connect So Cal is one of unlimited growth within the goods movement sector. Please note in the document that this is a choice rather than a foregone conclusion. Industrial and logistics-based demand management strategies should be included and be comprised of tiered, data-driven, well-justified and clearly stated goals for appropriate rather than unlimited growth and or regional transformation based on the best available data.	Comment noted.
0001757.19.1	The carrying capacity of the region should be a core part of any regional transportation plan due to the wear and tear on municipal and county roads, increased congestion, slowed emergency services due to truck-related congestion, and compromise of subterranean infrastructure such as pipes—including gas pipes that can leak and cause explosions—subterranean cables and wires, and even fiberoptics, which have all kinds of uses in monitoring environmental hazards and changes beyond their original intended use.	Comment noted.
0001757.19.2	Analyzing the carrying capacity of the region for Heavy Duty Trucks and logistics even just on roadways is a win on many levels. It is squarely within SCAG's role to convene "local governments and agencies to address regional transportation, land use and other issues of mutual concern." Our current logistics footprint is already outsized and residents absorb the costs of road and other infrastructural repairs through taxation. This stands in contrast to the building of industrial infrastructure, which services outsider populations and is underwritten by private corporate interests. But there is no equivalent tax for roadway repair, which is inevitably needed in logistics heavy duty truck usage.	Comment noted.
0001757.20	A carrying capacity study could also identify future opportunities for the trades to create union jobs, apprenticeship and pre-apprenticeship programs for subterranean roadway, pipe, and fiberoptic maintenance and repair. It could also determine the viability of widespread shifting to permeable surfacing, curb cuts and other measures that could help with water retention and percolation, the incorporation of green and/or cooling infrastructure, and also the possibility of energy producing surfaces or roadways.	Comment noted.
0001757.21	Please include a more robust engagement of the goods movement to connect the dots between transportation, infrastructural compromise and cost due to truck-related wear and tear, land use changes, equity and environmental justice, and climate change.	Comment noted. The Goods Movement Technical Report discusses freight related transportation system operations and maintenance need, community impacts and equity concerns, and resilience.
0001757.22	There is no mention of demand-management strategies related to heavy duty trucks and trade. As mentioned above, this is a missed opportunity due to the win-win of what it might mean to re-shore the economy. Relocalization efforts are increasingly supported by the federal government; thus funding will become available to support such efforts. Automation and AI will facilitate some of this movement. There is a need to project how will that change transportation planning. SCAG could lead on this in the state and nationally, which would be an exciting direction for our region, especially as a leader in global trade. SCAG could work directly with the Ports on planning such an initiative through projections into 2050.	Comment noted. Through upcoming studies and programs, SCAG will seek to develop freight transportation demand management approaches and strategies, which will be incorporated into future updates of Connect SoCal.
0001757.23	Achieving SCAG's GHG and Emissions Reduction Targets is easiest accomplished by encouraging and incentivizing local agencies to collaborate across boundaries and think through demand management strategies. Connect SoCal does this for commuters but not for HDDT, whose significant impact makes their treatment paramount in a transportation plan. For example, the statement that "the most significant and impactful strategies that are within the decision-making influence of the region include land use, user fees/pricing, transit/shared mobility and active transportation" needs to include responsible demand management strategies for trucks. This is the lowest cost, tech free, most expedient method of reducing emissions. SCAG could lead the state on this as well as the nation. Such an approach might give us a fighting chance at one day being able to be in attainment with our air quality and emissions reduction mandates as well as staving off the worst impacts of climate change. There are many ways this could happen and many possible approaches to such a study in the realm of sustainable development.	Comment noted. SCAG's current Senate Bill 375 greenhouse gas emission reduction target pertains only to automobiles and light trucks. Through upcoming studies and programs, SCAG will seek to develop freight transportation demand management approaches and strategies, which will be incorporated into future updates of Connect SoCal.

ID	COMMENT	RESPONSE
0001757.24	<p>Electrification and Increased Heat</p> <p>One last major concern that needs to be within Connect SoCal is the interlinkage between cleaner air via electrification and increased heat. This is one of the reasons why demand management strategies for goods movement are so important. Pollutants (particulate sulfur mostly) actually cause heat to decrease, because they reflect sunlight back out to space. Our goal, of course, should be to reach air quality attainment, so please do not misinterpret the following as a plea for the opposite. But warehousing in particular is something you can't have both ways. Both warehouse infrastructure and electrification increase the urban heat island effect, which causes an array of cascading problems from increased heart issues to increased heat stroke to increased energy usage via air conditioning.</p>	<p>Comment noted. For related information on smart growth, urban heat islands, and heightened health risks from worsening air quality and extreme heat, refer to the Connect SoCal 2024 Land Use and Communities Technical Report. For related information on EV infrastructure, refer to the Connect SoCal 2024 Mobility Technical Report.</p>
0001757.25.1	<p>You mention green infrastructure and this is most importantly deployed in two ways: both as facilities for electric vehicles and electrified trucks, but also to build out tree canopy, and urban greenspace and to preserve and conserve greenspace for the valuable and cooling resource that it is. I would like to request that SCAG note the increase in heat due to fleet and passenger vehicle proposed electrification, and to examine priorities in light of that reality. When combined with climate change, this increased heat will be a real killer.</p>	<p>Comment noted. For related information on smart growth, urban heat islands, and heightened health risks from worsening air quality and extreme heat, refer to the Connect SoCal 2024 Land Use and Communities Technical Report. For related information on EV infrastructure, refer to the Connect SoCal 2024 Mobility Technical Report.</p>
0001757.25.2	<p>I am counting on SCAG to be true to its mission: open, innovative, and courageous in its approach to Connect SoCal. All of the critiques made in this document are offered in the spirit of partnership and collaboration. Thank you again for the opportunity to weigh in on this plan. Please feel free to contact me if you require further information.</p>	<p>Comment noted.</p>
Submitted by	<p>Transportation Corridor Agencies</p>	<p>Submittal 0001751</p>
0001751.01	<p>Comments from the Transportation Corridor Agencies</p> <p>The San Joaquin Hills Transportation Agency and the Foothill/Eastern Transportation Corridor Agency ("TCA") appreciates the opportunity to review and provide comments on the Draft Connect SoCal Plan 2024-2050 Regional Transportation Plan ("RTP")/Sustainable Communities Strategy ("SCS") and associated Draft Programmatic Environmental Impact Report ("PEIR"). TCA commends the Southern California Association of Governments (SCAG) staff and consultants for the tremendous amount of work and effort in putting these documents together. TCA also recognizes and supports the timely adoption of the RTP/SCS to enable the Southern California region to proceed with the planning and implementation of regionally significant transportation projects. Further, TCA recognizes that the SCS is particularly important for the region to meet its state-mandated greenhouse gas (GHG) emissions reduction goals and federal Clean Air Act requirements.</p>	<p>Comment noted.</p>
0001751.02	<p>TCA generally supports the comments submitted by the Orange County Council of Governments (OCCOG) on behalf of Orange County jurisdictions, the Center for Demographic Research, the Orange County Transportation Authority, and other Orange County jurisdictions.</p>	<p>Comment noted.</p> <p>For responses to the Orange County Council of Governments (OCCOG) comments, please see comment IDs: 0001766, 0001777, 0001778, 0001779, 0001780, 0001781 001782 0001783, 0001784, 0001785, 0001786, 0001787, 0001788, 0001798, 0001790, 0001791, 001792.</p>

ID	COMMENT	RESPONSE
0001751.03	<p>In addition, please find below TCA's specific comments applicable to both the draft RTP/SCS and PEIR.</p> <p>Page 92, Regional Express Lanes Network: Concept of Operations and Buildout The Draft Connect SoCal Plan should include toll roads in the description of projects included in this category. TCA-operated Toll roads are complimentary to express lane and HOT lane facilities via FasTrak technology that allows interoperability and convenience for drivers.</p> <p>Recommended Clarification Revise the text in the first sentence under Regional Express Lanes Network on page 92 to read, "The regional express lane network, including toll roads, and Express/HOT lanes, integrates congestion pricing to..." The text under this section should discuss that all priced facilities in the SCAG region ensure inter-operability by using a common technology, FasTrak, to collect user fees.</p>	<p>Comment noted. Since the tolls collected on the TCA-operated Toll Roads in Orange County are exclusively to pay debt service for construction of the facilities and do not provide incentives for carpooling, it would not be appropriate to include them directly in a discussion with express/HOT lanes without further explanation. Additionally, it should be clarified that the Toll Roads are owned and maintained by Caltrans. Connect SoCal is updated to note the interoperability between the toll roads and the regional express lanes network.</p>
0001751.04	<p>Project List Technical Report Page 100, Table 1: FTIP Projects, FTIP ID ORA111207 [See table in attached letter] Recommended Clarification • In Table 1, we request that the Project Cost be updated to \$423M, consistent with FTIP Amendment number 23-11.</p>	<p>Project FTIP ID ORA111207 in Table 1 will be updated to reflect a total cost of \$423 million as reflected in the approved 2023 FTIP, Amendment #23-11.</p>
0001751.05	<p>Page 257, Table 2: Financially Constrained Projects, RTP ID 2T01135 [See table in attached letter] Recommended Clarification Project 2T01135, please change Lead Agency to "Various Agencies" consistent with Table 1 and update the project cost to \$423M consistent with the FTIP Amendment number 23-11.</p>	<p>Project RTP ID #2T01135 in Table 2 will be updated to reflect a total cost of \$423 million and the lead agency will be updated to "Various Agencies" as reflected in the approved 2023 FTIP, Amendment #23-11.</p>
0001751.06	<p>TCA thanks you in anticipation of your written responses to these comments. We look forward to the amendments in the final 2024-2050 RTP/SCS and associated PEIR to incorporate the recommended changes. Should you have any questions or require any clarification regarding these comments, please feel free to contact me at 949.754.3454 or via email at sblanco[at]thetollroads.com.</p>	<p>Comment noted.</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter REG-2 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
Submitted by	Ventura County Transportation Commission	Submittal 0001736

ID	COMMENT	RESPONSE
0001736.01	<p>Page 10, Environment section. Plan states "In addition, urbanization continues to consume farmlands and open spaces, which contributes to the loss of groundwater supply and habitat spaces, which contributes to the loss of groundwater supply and habitat spaces that play a critical role in strengthening our region's resilience." While this may be true in general across the region, it is not entirely true in each county within the region. Ventura County has long-standing protections in place for open space and agricultural lands (i.e. Guidelines for Orderly Development, Save Open Space and Agricultural Resources (SOAR) Ordinances, etc.), which limits the loss of farmlands and open spaces to urbanization.</p> <p>This same issue also comes up in Chapter 2, page 56, second column, last paragraph "Loss of Open Space."</p>	Text is changed from "In addition, urbanization continues to consume farmlands and open spaces" to "In addition, in most of the region urbanization continues to consume farmlands and open spaces."
0001736.02	Chapter 1, Page 12, Focusing on Objectives section: Plan states, "By 2050, the population of the region is projected to increase by two million people, or 11 percent, with an increase of 1.6 million housing units, or 26 percent, and 1.3 million jobs, or 14.2 percent." It should be noted that the level of growth region-wide is not uniform across each county or jurisdiction, notably that Ventura County's population is projected to decline.	A sentence to this effect has been added following this paragraph.
0001736.03	Chapter 2, Section 2.2, Page 31: Plan states "Returning riders are apprehensive about their safety and security as they resume using transit/rail services." Such apprehension is not a universal sentiment across transit riders or operators, but is presented as such. Suggest adding a modifier to the sentence, such as "Many returning riders" or "Some returning riders."	<p>SCAG is revising the text to read: "Some returning riders are apprehensive about their safety and security as they resume using transit/rail services."</p> <p>For reference, the prior text reads: Returning riders are apprehensive about their safety and security as they resume using transit/rail services.</p>
0001736.04	Section 2.3, Page 38 - Plan references the Ports of Long Beach and Los Angeles as the largest container complex in the U.S. among other key goods movement assets within the region. On page 38 and several other locations within the Plan, the text neglects to acknowledge the Port of Hueneme, which is located in Ventura County and is an important part of the regional and national goods movement network. The Port of Hueneme is the only deep-water port between Los Angeles and San Francisco, and the only military deep-water port between San Diego and Seattle. It's importance should also be reflected in Connect SoCal. This same issue also applies to discussions of Goods Movement on Pages 58 and 60.	<p>Page 38 Mobility Overview text is updated to state, "Our transportation network supports the largest container complex in the U.S., the Port of Los Angeles and the Port of Long Beach, as well as the Port of Hueneme, and helps....."</p> <p>Page 58 Economy Overview text is updated to state, "Combined, the ports of Los Angeles and Long Beach terminals handle 35 percent of all waterborne containers entering and exiting the U.S., while the Port of Hueneme serves as a leading U.S. port for autos and fresh produce."</p> <p>Page 60 Goods Movement text is updated to state, "Southern California has the largest container port complex in the United States, and includes three deep-water ports."</p>
0001736.05	Map 2.2 on Page 40 includes Bus Routes and Freeway designations shown in colors that are barely visible and are not distinguishable from one another.	Comment noted. The maps provided within Connect SoCal are intended to be viewed at a high level to understand the distribution of routes across the region. SCAG recommends zooming in on the map for more clarity. More datasets and interactive maps will become available following the Plan's adoption.
0001736.06	Transportation Finance - Funding the System section, on page 46 - the first full paragraph of the third column discusses local sales taxes dedicated to transportation as "the largest single source of revenue" for transportation. It should be noted/acknowledged in this section that not all of the counties currently have such a sales tax. Notably Ventura County does not currently have a local sales tax measure dedicated to transportation.	Comment noted. Specific local transportation sales tax measures are discussed in Chapter 4 and the Transportation Finance Technical Report, both of which note that Ventura County does not currently have a local sales tax measure dedicated to transportation.
0001736.07	<p>Communities Section. On page 49, first full paragraph in the first column discusses housing production and changing demand for housing. This begs the question: What is the impact of shifting demographics on housing demand?</p> <p>For example, in Ventura County, projections reflect a decline in population by 2050, but a substantial increase (13%) in the number of households. This may seem counterintuitive, but average household size is going down, and more housing is needed to meet the needs of our communities despite a declining or stable population.</p> <p>Being able to explain this relationship between demographics and housing demand is important for communicating the need for new housing in many communities across the region.</p>	Added a sentence explaining the expectation of smaller household sizes and a reference to the Demographics & Growth Forecast Technical Report for further detail.

ID	COMMENT	RESPONSE
0001736.08	<p>Map 2.5 on Page 51 - Is this map showing employment density by TAZ? Is it normalized for the size of the TAZ, i.e. per acre? Or something else? Is it employment density or number of employees? Label should clarify what is being reflected in the map legend. Same issue for Map 2.6 on Page 52. Label should more clearly reflect what is being measured.</p> <p>This question is relevant to Ventura County, for example, as the map shows the area that includes Naval Base Ventura County Port Hueneme shows a density of Less than or Equal to 500, and the area that includes Naval Base Ventura County Point Mugu shows employment of 1,000 - 2,500. If the map reflects numbers of employees per TAZ, then that can't possibly be correct, as NBVC is the largest employer in the county with ~17,000 active-duty military, civilian employees, and contractors between the two locations.</p>	<p>The numbers reflected in the map include the employment density or jobs per square mile for each TAZ. A subtitle indicating the units of measure has been added to Maps 2.5 and 2.6.</p>
0001736.09	<p>Map 2.6 Existing Regional Goods Movement shows one Airport in Ventura County (with the icon placed at the location of Naval Base Ventura County Point Mugu). Ventura County has two public airports (Camarillo and Oxnard) and one private airport (Santa Paula) in addition to the military airport at Point Mugu. Perhaps be more clear about why NBVC Point Mugu's airfield is shown on the map, but particularly the two public airports (CAM and OXN) are not shown.</p>	<p>Comment noted. The report is updated to include Camarillo and Oxnard airports in Map 2.6.</p>
0001736.10	<p>Page 89, Transportation Integration section - Glad to see the VMT and GHG emissions aspects of ride-hailing and automated vehicles acknowledged in the Plan. Concur with the assessment that it is important to emphasize shared rides and efforts to reduce "deadheading" practices.</p>	<p>Comment noted.</p>
0001736.11	<p>Page 90 Project List section includes the best explanation of FTIP and RTP that I've ever seen but would benefit from also defining in this section what rises to the level of "regionally significant" projects.</p>	<p>Thank you for the feedback on the explanation of FTIP and RTP. Regionally significant project is defined in the U.S. EPA's Transportation Conformity Regulations and is intended to limit emission analysis to those projects that would have significant impact on regional travel, emissions, and air quality. For the purpose of regional transportation modeling and regional emissions analysis in the SCAG region, any transportation facility project meeting one of the following criteria is considered regionally significant: Freeways; State Highways; Principal Arterials; Major Arterials; Routes that provide access to major activity centers such as amusement parks, regional shopping centers, military bases, airports and ports; Goods Movement Routes including both truck routes and rail lines as well as rural agricultural routes that provide goods to the regions; Intermodal transfer facilities such as transit centers, rail stations, airports, and ports; and Fixed transit routes such as light and heavy rail, commuter rail, and express and local bus routes.</p>
0001736.12	<p>Map 3.4 of Priority Development Areas includes Sphere of Influence, but does not show City boundaries. As a result, the SOIs seem to be out in the middle of nowhere, rather than being located (for the most part) adjacent to existing city boundaries. It would make more sense to include the SOIs if city boundary outlines (or a different color for areas within existing cities) were shown.</p>	<p>Comment noted. Incorporated city boundaries have been added back in to make the map more legible.</p>

ID	COMMENT	RESPONSE
0001736.13	<p>Strategies 42 - 44 promote 15-Minute Communities, which is a worthwhile and laudable goal, however, it can be difficult or even impossible to achieve within more rural and suburban communities. As such, SCAG should consider adding a strategy to encourage context-sensitive complete corridors concept supported by a transit backbone, which may be more achievable in the more suburban and rural parts of the region. For more information/context, see - https://nap.nationalacademies.org/catalog/23630/livable-transit-corridors-methods-metrics-and-strategies.</p>	<p>Comment noted. The 15-minute community concept has been elevated in the plan because it is intended to have broad applicability across a variety of communities, including those in those that are rural and suburban. To that end, the overarching policy around 15-minute communities (#42) includes language that SCAG's efforts around 15-minute communities should "support the diversity of places (or communities) across the region".</p> <p>In addition, Connect SoCal includes a wide array of strategies that could be utilize in context-sensitive communities. One component of that is the development of SCAG's Priority Development Areas, which includes the concept of Livable Corridors. Livable Corridors are areas where local jurisdictions may plan and zone for increased density at nodes along key corridors, and to "redevelop" single-story under-performing retail with well-designed, higher density housing and employment centers. Growth at strategic nodes along key corridors, many of which are within High Quality Transit Corridors (HQTCs), will make transit a more convenient and viable option. The Livable Corridors network is developed utilizing select variables from past regional plans like HQTCs and input from local jurisdictions during LDX. Additional strategies focused around implementing Priority Development Areas can be found in section 3.3 of the Main Book under strategies 32, 33, and 34.</p>
0001736.14	<p>Strategy 63 states, "Encourage the conservation of agricultural lands to protect the regional and local food supply and the agricultural economy." Suggest a small revision to acknowledge not only the conservation of ag lands but also the economic viability of agriculture within the region so that such conservation can be achieved. For example, "Encourage the conservation and viability of agricultural lands to protect the regional and local food supply and ensure the sustainability of local agriculture as a vital part of the region's economy."</p>	<p>Comment noted. Strategy 63 in Chapter 3 and the Land Use and Communities Technical Report has been updated from, "Encourage the conservation of agricultural lands to protect the regional and local food supply and the agricultural economy." to "Encourage the conservation and viability of agricultural lands to protect the regional and local food supply and ensure the sustainability of local agriculture as a vital part of the region's economy."</p>
Submitted by	World Be Well Organization	Submittal 0001775
0001775.01	<p>World Be Well was also awarded a SALC grant to build organizational and financial capacity in Riverside and San Bernardino Counties. The Oswit Land Trust and Native American Land Trust were also awarded grants. We intend to serve as a conservation developer, seeking opportunities to work with landowners and developers to implement smart development that reduces the loss of agricultural lands and open spaces.</p> <p>Since 1984, Inland SoCal has traded 191,00 acres of farmland and open space for forty square miles of warehouses. We welcome the opportunity to collaborate with other land trusts and with SCAG on the planning grant award for an Agricultural Lands Economic Benefit Study.</p> <p>World Be Well was instrumental in convincing CDFG to reconsider leaving Riverside San Bernardino off the regions list for the 2023 Urban Agriculture Grant Program. Neither Riverside nor San Bernardino have populations of 500,000 or more, yet we comprise the twelfth largest metro statistical area in the U.S. plus we have thirty cities over 50,000. We alerted them that according to their own criteria, our region would rank number one in tribal populations, second in low-income communities behind the eight county Bay Area, and number three in disadvantaged communities. Their reconsideration guarantees an \$800,000 block grant to the region, in addition to individual urban agriculture project awards. Our region's share of total funds available is projected to be around \$12 million.</p>	Comment noted.

ID	COMMENT	RESPONSE
0001775.02	<p>Resistance by communities to zoning criteria that extract value, equity, health, and longevity from them is growing. A reconsideration of the costs and externalities that go unmitigated by our zoning decisions is warranted. We also recognize the realities of our rising land valuations and the pressure that bears on SCAG's target of preserving forty-one square miles of open space infill development.</p> <p>SCAG's work helps facilitate implementation, but the agency does not implement or construct projects or have land use authority. SB 375 did not give SCAG and other metropolitan planning organizations any land use authority.</p> <p>In the role of conservation developers, World Be Well will take advantage of potential match funds from NRCS-ACEP and RCA. Funding is also available via SCAG, private land developers, and other private donors. We have several market-based solutions to leverage potential tax incentives and match funding incentives for master community developers, who can capture value by including conservation development in the form of agrihoods in their projects. This is also one of the qualifying CEQA mitigation requirements for SCAG's plan.</p>	<p>Comment noted.</p>
0001775.03	<p>In your Supplemental Information section, you list the legislative mandates that informed this plan, and that impact your Healthy Communities Strategy. When I got to the letter S, I expected to see a reference for SB 1000.</p> <p>SB-1000 (2015-2016) requires local governments to identify environmental justice communities in their jurisdictions and address environmental justice in their general plans, which serve as a local government's "blueprint" for how the city and/or county will grow and develop.</p> <p>It provides a policy framework for thriving communities. Taken as a collaborative lens and shared at the municipal level, SB 1000 should be considered a catalyst for managing the vital conditions required for thriving communities [https://www.communitycommons.org/collections/Seven-Vital-Conditions-for-Health-and-Well-Being].</p> <p>Reliable transportation is one of the seven vital conditions needed for health and well-being.</p> <p>Given the urgency and overwhelm cities endure as they attempt to manage vital conditions that are out of balance and in an endless crisis mode, SB 1000 is a way to engage community and to speed up much needed capacity building to match the urgency our cities are facing.</p>	<p>The glossary only includes legislation that is mentioned in the main book of the Plan. SCAG recognizes the importance of SB 1000 in encouraging thriving communities and included additional information about it in the Equity Analysis Technical Report, which already includes references to SB 1000 in Section 10, along with resources to support local jurisdictions in addressing environmental justice in their general plans.</p>
0001775.04	<p>Community-based organizations (CBOs) are best suited to press local governments to adhere to SCAG's Sustainable Communities Strategy through the implementation of SB1000.</p> <p>SCAG should work with CBOs to improve local government adherence to the SCS. SCAG should also make available its Regional Greenprint, web-based tool, to assist CBOs with the best available scientific data and scenario visualizations to support the SB1000 toolkits that organizations use to implement environmental justice elements into the general plans of their local jurisdictions.</p>	<p>Comment noted. The incorporation of CEJA's SB 1000 Implementation Toolkit is addressed in Section 10 Equity Resources for Action (ERA) Toolbox of the Equity Analysis Technical Report and is considered throughout the ERA Toolbox. In reference to the SoCal Greenprint, the tool will be publicly available as prescribed by the Connect SoCal 2020 adopted PEIR, as well as the Draft Connect SoCal 2024 PEIR (SMM-AG-3), which requires that it be "publicly available". Further, community-based organizations and non-profit organizations have been active in helping to inform the development of the SoCal Greenprint.</p>
0001775.05	<p>Word Be Well suggests incorporating the SB 1000 Implementation Toolkit [https://caleja.org/2017/09/sb-1000-toolkit-release/#form] available from the Environmental Justice Alliance. It offers a detailed and comprehensive way for cities to analyze and implement their strategies guided by the community's voice. It's a roadmap to a thriving region and consistent with SCAG's Healthy Communities Strategy.</p>	<p>Comment noted. The incorporation of CEJA's SB 1000 Implementation Toolkit is addressed in Section 10 Equity Resources for Action (ERA) Toolbox of the Equity Analysis Technical Report and is considered throughout the ERA Toolbox.</p>

ID	COMMENT	RESPONSE
0001775.06	<p>World Be Well is encouraged by SCAG's commitment to mitigate loss of farmland where such loss will have significant and unavoidable Impacts. Most developers within the SCAG region that submit Environment Impact Reports under CEQA also note that while loss of farmland may have significant and unavoidable impact, they also claim that such loss is not mitigable.</p> <p>World Be Well encourages the use of SCAGs advanced mitigation programs as tools that developers can use to mitigate their projects. However, enforcing mandatory mitigation mandates may adversely impact the use of voluntary mitigation that may provide charitable contribution benefits to landowners and developers under Section 170 of the U.S. Tax Code.</p>	<p>Comment noted. SCAG's strategy for Regional Advance Mitigation Program is intended to be voluntary. To better reflect this, the Implementation Strategy in Connect SoCal is revised from "Work with implementation agencies to support, establish or supplement Regional Advance Mitigation Programs (RAMP) for regionally significant transportation projects to mitigate environmental impacts, reduce per-capita VMT and provide mitigation opportunities through the Intergovernmental Review Process" to "Work with implementation agencies to support, establish, or supplement voluntary Regional Advance Mitigation Programs (RAMP) for regionally significant transportation projects that help mitigate environmental impacts and reduce per-capita Vehicle Miles Traveled (VMT), and provide enhanced data on mitigation opportunities through the Intergovernmental Review Process."</p> <p>For comments related to the Connect SoCal 2024 Program Environmental Impact Report (PEIR), please refer to PEIR Letter ORG-15 in Chapter 8.0, Response to Comments, of the Final Connect SoCal 2024 PEIR available at: https://scag.ca.gov/peir</p>
Submitted by	A, Aida	Submittal 0001730
0001730.01	<p>I am alarmed that this project list includes plans for street widening and a large focus on vehicle-centered infrastructure that will not lead to climate goals, reducing air pollution, or creating sustainable cities. This project list should be aimed at increased public transportation, active transportation, and lastly fixing roads--not widening them. The amount of people dying from vehicles has increased to crisis numbers not seen in decades. In 2018, 893 pedestrians were killed on California roadways, a 26% increase from 2014. California's pedestrian fatality rate is almost 25% higher than the national average. No state has more pedestrian deaths on its roadways than California. Los Angeles leads California in the most pedestrians and bicyclists killed in the state. The NHTSA projection for traffic fatalities in the first 9 months of 2021 is the highest number of fatalities during the first nine months of any year since 2006 and the highest percentage increase during the first nine months in the Fatality Analysis Reporting System's history—31,720, an increase of approximately 12% from the 28,325 fatalities projected for the first nine months of 2020. Other cities, like Chicago, have pledged to increase protected bike lanes, and Los Angeles is far behind in its commitment to safe active transportation. With the increasing ill effects of climate change and the high cost of vehicle ownership, cycling and walking should be safe options for Angelenos. The focus of every public agency should be creating safer streets, no fast streets. The last thing public agencies should be doing is recycling the same planning characteristics that increase speed on streets. It is very evident that these decisions have been an utter failure, increasing fatalities in our communities, and not decreasing congestion. Stop using taxpayer money to create dangerous streets, and fund street safety.</p>	<p>Comment noted. In accordance with state and federal requirements, Connect SoCal must take into account all regionally significant surface transportation projects and strategies proposed to be funded by federal, state, local, and private sources over the life of the Plan. The Project List Technical Report describes those transportation projects. Since the SCAG region must also demonstrate transportation conformity, the Project List must include additional detail on projects that can be modeled. Non-automobile projects like investments in active transportation typically cannot be modeled directly for transportation conformity and are therefore underrepresented in the project list.</p> <p>Recognizing the transportation safety challenges confronting the region, SCAG adopted a resolution in 2021 affirming its regional leadership role and commitment to advancing transportation safety with a Regional Safety Policy that endorses Toward Zero Deaths (TZD) as part of a comprehensive effort to strive to achieve zero transportation-related fatalities and serious injuries in the SCAG region by 2050, if not sooner. SCAG has several efforts to advance roadway safety for people walking, biking, and riding transit. Each year, SCAG evaluates the region's transportation-related fatalities and serious injuries and develops targets for the region. In addition, SCAG secures and distributes funding for alternative transportation options (walking, biking, using micromobility, and riding transit) on an ongoing basis. In 2023, SCAG secured a \$12 million Safe Streets and Roads for All (SS4A) federal grant to develop a Regional Safety Action Plan. The grant funds also will be used to expand SCAG's Go Human program, including the piloting of local safety campaigns and Complete Streets pop-up demonstration activities, and funding up to 15 mini-grants to community-based organizations. The grant will also support the piloting of quick build demonstration activities through a competitive call for projects. In addition, SCAG facilitates the state/regional Active Transportation Program to ensure grant funds are distributed throughout the SCAG region to support active transportation improvements.</p>
Submitted by	Albert, James	Submittal 0001677
0001677.01.1	<p>In terms for revenue generation, in the absence/reduction of fuel taxes due to EV adoption, I am concerned about SCAG being overly reliant on users for revenue and not taking into account the weight of road users.</p>	<p>Comment noted. Connect SoCal acknowledges that work needs to be done to support an equitable transition to a user fee system. SCAG's key guiding principles for financial strategies includes establishing a user-based system that better reflects the true cost of transportation, provides firewall protection for new and existing transportation funds, and ensures an equitable distribution of costs and benefits. This could include exploring issues like vehicle weight among other considerations.</p>

ID	COMMENT	RESPONSE
0001677.01.2	Also, I'd like SCAG to work with our local leaders to incentivize carpooling along the new 10 freeway express lanes.	Comment noted. Rideshare programs are included in Connect SoCal and implemented on a countywide basis by the county transportation commissions such as LA Metro and the San Bernardino County Transportation Authority.
Submitted by	Albert, James	Submittal 0001707
0001707.01	<p>I know it was really fast in terms of going through the transition for revenue generators. It sounded like you were trying to replace the lost revenue from going to electric vehicles, by an emphasis on user fees.</p> <p>I'm kind of just interested in I think, want to promote that we should definitely keep, consider the weights of vehicles as well in that revenue generator. Just to make it more equitable. And and definitely, in terms of the San Bernardino area, I know that we're starting to roll out the express lanes along the 10 freeway but I haven't necessarily seen our local leaders being proactive on promoting rideshare opportunities like I have in terms of Orange County. Like, I know that they're promoting the "if you have 3 or more drivers and/or riders in your car that you get free, free access to the express lanes". I'd like to see something similar in the San Bernardino area but again, I think the revenue generators shouldn't be solely based on the users, but more so the weight of the vehicles, because they're the ones that are making the biggest impact on our roads. Thank you.</p>	<p>Connect SoCal acknowledges that work needs to be done to support an equitable transition to a user fee system. SCAG's key guiding principles for financial strategies includes establishing a user-based system that better reflects the true cost of transportation, provides firewall protection for new and existing transportation funds, and ensures an equitable distribution of costs and benefits. This could include exploring issues like vehicle weight.</p> <p>According to the San Bernardino County Transportation Authority Express Lanes Toll Policy, vehicles with three or more passengers can use the SB Express Lanes without charge at all times. A FasTrak Flex (switchable transponder) is required to identify the number of passengers in a vehicle.</p>
Submitted by	Billay, Perias	Submittal 0001701
0001701.01	<p>Hello. My name is Perias Billay. That's P.e.r.i.a.s. - Perias. Last name Billay - B.i.l.l.a.y.</p> <p>I've been using public transportation here in Southern California since I arrived in 1981 to attend Pomona College in Claremont.</p> <p>And I haven't seen the list of projects in your plan, but I hope it includes a plan to move the railroad tracks in San Clemente... it belonged to the City, the Orange County Transportation Authority...inland.</p> <p>Those tracks have been closed twice for several months at a time this year, causing major problems for riders of the Amtrak Pacific Surfliner; two Metrolink lines - the Orange County line and the Inland Empire/Orange County Line; and probably for the freight company, BNSF, that uses the tracks overnight.</p> <p>The San Diego Association of Governments, SANDAG, is funding a similar project to move the tracks in Del Mar in San Diego County, inland, and the tracks that belong to the NCD, the North County Transit District, and I hope SCAG can also fund something similar in Orange County.</p> <p>Those are the 2 parts of the, of that major rail corridor between Los Angeles and San Diego, that are subject to landslides and closure, often for months at a time.</p>	<p>Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. The Orange County Transportation Authority (OCTA) is evaluating options to protect the track in place over the nearer term and potentially relocating the tracks inland over the long term. SCAG will continue to work with OCTA to incorporate any outcomes from their efforts into the Project List, likely through an amendment to Connect SoCal 2024.</p>
Submitted by	Binnie, Michael	Submittal 0001705

ID	COMMENT	RESPONSE
0001705.01	<p>These projects as prioritized in the Connect SoCal plan will do absolutely nothing to address congestion but will instead result in induced demand and lead to more cars and trucks on the roads. This is the same planning boondoggle that SCAG and its predecessors have used for decades and will just reinforce SoCal's car-centric identity for decades to come. Please do better and prioritize other methods of sustainable and low pollution transportation, specifically rail transport, including meeting your legally required goals of the California Air Resource Board. Please do better with these capital funds.</p>	<p>Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region and development of 15-minute communities, places where people can access all of their basic, day-to-day needs, services and amenities within a 15-minute walk, bike or roll from their homes. These are places where people are able to make fewer and/or shorter trips due to the proximity of activity centers and destinations. The Mobility Technical Report details additional strategies (e.g., dedicated bus lanes, mobility hubs, etc.) and investments that support growth towards this vision.</p>
Submitted by	Bowman, Daniel	Submittal 0001716
0001716.01	<p>There seems to be a lack of vision or even attempt at a vision of how we can better improve out transportation. Most of the plan is just to point out that other agencies are planning for their areas. Meanwhile, SANDAG is envisioning how to make transit even better than driving through creative ideas. This whole book looks slapped together to show of widening freeways will somehow help. The document list complete streets as a desired outcome but then doesn't show one plan to implement a complete street. Same with active transportation. There isn't one map showing all of the bikeways planned? Does that mean there are none? What about high speed rail. Isn't that going to be important? And then a lot of data seems just wrong. For example the I-5 freeway is listed as planning on adding an HOV lane between 55 & 57. That was completed in 2020. And then for the list that state Build vs No Build data, both are the same number. If you are planning on spending \$850 billion and nothing changes, why build at all. Please read through all your documents for accuracy and plan for a better future for transit (rail not bus) and active transportation (more protected bikes lanes). Otherwise don't waste our money for a bleaker future.</p>	<p>Comment noted. Connect SoCal envisions a future where transportation is efficient, multimodal and accessible to all. In the future, the region is envisioned to have an abundance of safe, accessible, and connected active transportation and transit/rail options. The Mobility Technical Report details the strategies (e.g., dedicated bus lanes, mobility hubs, bikeways, etc.) that support growth towards this vision. Please review this report for maps of planned active transportation and transit/rail facilities.</p> <p>Regarding your more detailed feedback, the Plan's Base Year is 2019. A project in the Federal Transportation Improvement Program (FTIP) with a 2020 completion year would not be reflected (as the cutoff is 2019). Regarding feedback on the Plan's build vs. no build data, the Conformity Report table shows Baseline and Plan assumptions about work trips reduced due to telework/work from home. These are assumptions going into SCAG's activity based model, and not output or performance from the model.</p>
Submitted by	Burns, Philip	Submittal 0001703
0001703.01	<p>The Project List doesn't reflect true prioritization of active and public transit. SCAG must recognize that dollars need to change if aspirations are to be met. Road widening projects should not be included.</p>	<p>Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. It is important to note that the draft Connect SoCal 2024 includes \$38 billion for active transportation investments and \$385 billion for transit and passenger rail investments. Together, this accounts for over half of total plan expenditures. For final Plan investment information, please see the Transportation Finance Technical Report.</p>
Submitted by	Chen, Caroline	Submittal 0001663
0001663.01	<p>Hello,</p> <p>A recent study was done on how communities in historically redlined areas continue to have less access to nature in terms of biodiversity (defined as variety of living organisms) than areas that were not redlined. https://www.latimes.com/environment/story/2023-10-11/historic-redlining-bird-biodiversity.</p> <p>Here's the link to the actual study: https://academic.oup.com/condor/advance-article/doi/10.1093/ornithapp/duad044/7303192</p> <p>This is lamentable because some studies show that exposure to nature can reduce stress levels and improve mental health. Not everyone has time or the ability to travel to wilderness areas to experience the wonders of biodiversity. One possible remedy may be for jurisdictions to increase the number of native trees in public spaces so that native wildlife that have co-evolved with these trees can begin to repopulate historically redlined areas low in biodiversity. Oak trees, in particular, support a staggering amount of wildlife.</p> <p>Thank you!</p>	<p>The Plan includes several strategies that help to equitably address biodiversity loss in urban areas through urban greening and other nature-based solutions such as green stormwater capture and landscaping with native and drought-tolerant plants. For more detail, please see section 6.2.1 Nature Based Solutions in the Land Use and Communities Technical Report.</p> <p>In addition, Section 6.3 of the Equity Analysis Technical Report measures the percentage of the regional population that can access a public park with auto, transit, bike, and walk modes.</p> <p>SCAG staff appreciates how this research applies an equity lens to biodiversity and will consider this report in future resilience and equity work.</p>
Submitted by	Clarke, Darrell	Submittal 0001699

ID	COMMENT	RESPONSE
0001699.01	<p>We have a mandate from the California Air Resources Board in last year's climate, scoping plan for a per-capita reduction in vehicle miles traveled, of 25% by 2030.</p> <p>How?</p> <p>And, and my apologies for not having combed the document first before asking the question, but to what extent does the regional plans, transportation content embody the 25% reduction target, you know that's based in statute in California?</p>	<p>The Scoping Plan, developed by CARB, details how the State will achieve its GHG emission reduction targets. While VMT reduction targets and strategies are included in the Scoping Plan, these targets are not regulatory requirements, but will inform future planning processes. Just as prior Scoping Plans informed the current 19 percent GHG emission reduction target that CARB set for SCAG, CARB may consider the 25 percent VMT reduction target in the 2022 Scoping Plan when setting new GHG emission reductions for SCAG in 2026.</p>
Submitted by	Dedicatoria, Kevin	Submittal 0001708
0001708.01	<p>Yes, hi! I'm Kevin from Chino Hills, San Bernardino.</p> <p>My...I'm going based on observation and my comments and questions are kind of intertwined.</p> <p>I've, like, I moved from Michigan to San Bernardino, San Bernardino County a couple of years ago from work, and I've noticed how San Bernardino County and Riverside County...yes, they are a separate metropolitan area...but I've noticed that, you know, with LA, the Orange County, Ventura County, San Bernardino County, Riverside County...even though they try to kind of create their own distinct economies and try to distinct themselves from each other, they're still intertwined with the population and the economy and stuff.</p> <p>And I'm thinking...why...why try to distinct themselves like, we kind of depend within our, within our respective counties and each other. And I think I see within this kind of presentation like, especially with the transit part, like, why not learn from the Bay Area and try to create something like the Clipper, the Clipper Card, or the Clipper Cards, something especially with transit, with Metrolink, and something like that. I think something like that would be especially valuable.</p> <p>And how, how would this program...especially...how would this kind of plan especially deal with the, "not in my backyards," and any kind of overlaps and kind of redundancies, you see with state, local and federal law to kind of push back on any transit plans with expanding bus rapid transit and light rail/regional rail, because I there's like a segment that I personally would use to, kind of on Metro, to expand the unfunded segment from...I think it's Pomona to Montclair, and it's like I responded to Metro personally, and they said, "No, no, no, no," because it's not because that's in San Bernardino County and San Bernardino. SB County is like, "no, no, no, no", we're not gonna fund it, that's on Metro's end.</p> <p>And I'm thinking...this is like an opportunity here to expand transit, whereas Metrolink, despite it gradually being from a commuter rail into something more round the clock... it's kind of an opportunity like to take cars out of the equation, for people to hop on a train.</p> <p>But Metrolink as long as it's still depends on using the same track as freight rails...it's like, to not seize the opportunity to use Metro and expand Metro's length.</p>	<p>Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region and development of 15-minute communities, places where people can access all of their basic, day-to-day needs, services and amenities within a 15-minute walk, bike or roll from their homes. These are places where people are able to make fewer and/or shorter trips due to the proximity of activity centers and destinations. Connect SoCal also includes the following strategy that supports creating transit/rail systems that connect more readily: "Enable a more seamless mobility experience through the implementation of Mobility as a Service (MaaS). This may include leveraging Cal-ITP's support, initiating open-loop payment demonstrations, and testing shared product systems and post-payment solutions." For reference, in 2022 SCAG completed the MaaS Feasibility White Paper to study the key building blocks for successfully implementing a MaaS system in the SCAG region, which would integrate transportation services into a single mobility platform to provide competitive alternatives over private vehicles, promote universal basic mobility, encourage mode shift, and foster sustainable travel choices. The Mobility Technical Report details additional strategies (e.g., dedicated bus lanes, mobility hubs, etc.) and investments that support growth towards the transportation vision.</p>

ID	COMMENT	RESPONSE
0001708.02	<p>It's kind of like...I get that we kind of want to foster economic growth within our... (timer went off, and he was asked to conclude his comment).</p> <p>What I'm saying is, I agree...to kind of deny the inevit...to kind of ignore the interdependence we have within our respective counties and metropolitan areas is kind of naive. But I also agree that we need to foster growth within our counties and respective areas.</p> <p>But how is this plan exactly dealing with the challenges of not in my backyards, and the people who are using environmental laws, local laws and state and federal laws to push back against especially transit, priority bike lanes and so on?</p>	<p>Comment noted. SCAG provides resources to local jurisdictions through the Sustainable Communities Program to pursue local planning efforts, see Chapter 2. Working with the local community during these planning efforts is a standard best practice to ensure more successful implementation. However, it should also be noted that through the survey of local jurisdictions during Connect SoCal 2024 development (see SCAG Policy Committee Agendas for June 2023) the majority of responding jurisdictions cited lack of staffing or resources as the primary barrier to implementation. Political or community pushback was cited as a barrier to some specific policies, such as parking reform, but was not the primary challenge.</p>
Submitted by	Ertl, Dawn	Submittal 0001693
0001693.01.1	<p>Hi, I have a project I would like to implement as a pilot program. https://homegrown-thehempproject.art/current-homegrown-proposal I realize you likely can't help me directly right now because you are looking for feedback on this presentation. But I'm wondering if you would be willing to include a plan to make pilot program proposals easier for the area, especially one related to the climate crisis. I have had a very difficult time getting a hold of people who can help me with this project even though it would help directly with many of your goals for the city. It would contribute directly to concerns of equity, clean air, land use, sustainable futures and so much more. It's main purpose however is to absorb carbon while utilizing mainly residential spaces.</p>	<p>Comment noted. To share your input or ideas for future SCAG programs, please sign up to provide public comment at a meeting of the Regional Council or one of its policy committees, details of which can be found on SCAG's website.</p>
0001693.01.2	<p>As for this plan. I only recently got this/or noticed the email with your plan. I have Dyslexia, so I wish there was an audio version of this presentation. It is fairly long. I am excited that more investments are going to be made to public transit, I prefer public transit to driving, and take it whenever I can. I wish there were more direct lines from the San Fernando Valley to many other places in rest of southern CA, since it still takes a fairly long time to get anywhere from here especially using public transit. I wish there was more direct access to the beach, and more hubs than one downtown, although that's mainly because I'm afraid of the Pershing Square stop, and I try to avoid it at all costs.</p> <p>As for transit, I also wonder if you could have an app available for fairs, maybe something that used a QR code that you could add money to anywhere and that you could use on all of the transit systems? I think you should still have tap cards, but most bus stops don't have tap card reloading and purchasing access. There have been times when I have run out of money on my tap card without anywhere near a place to reload it, and also not having any cash on me. It would make it so much easier to use public transit if there was a fair related app.</p> <p>Ok I guess that's all, since I'm almost out of room. thanks</p>	<p>Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas. This includes the Sepulveda Pass Transit Corridor connecting the San Fernando Valley to the Westside.</p> <p>Connect SoCal includes the following strategy that supports building more seamless connections between transit/rail: "Mobility as a Service (MaaS): Enable a more seamless mobility experience through the implementation of MaaS. This may include leveraging Cal-ITP's support, initiating open-loop payment demonstrations, and testing shared product systems and post-payment solutions." For reference, in 2022 SCAG completed the MaaS Feasibility White Paper to study the key building blocks for successfully implementing a MaaS system in the SCAG region, which would integrate transportation services into a single mobility platform to provide competitive alternatives over private vehicles, promote universal basic mobility, encourage mode shift, and foster sustainable travel choices. The Mobility Technical Report details additional strategies (e.g., dedicated bus lanes, mobility hubs, etc.) and investments that support growth towards this vision.</p>
Submitted by	Hague, George	Submittal 0001752

ID	COMMENT	RESPONSE
0001752.01	<p>[image]</p> <p>The above expresses visually my thoughts on adding lanes to existing roads which only adds more vehicles and more pollution without really improving safety over time. Wider highways mean more vehicles and more pollution. Across the US, transportation is already responsible for 27% of the country's greenhouse gas emissions. Some states and cities are looking at alternatives. In Los Angeles, an expansion to Interstate 710 was abandoned in 2022 after the chief planning officer noted the city didn't see "widening as a strategy" for the city.</p> <p>In Portland, young climate activists have been fighting against a \$1.2 billion plan to widen the I-5 in a section which runs through a neighborhood called Albina, a historically Black neighborhood. So, what's the answer? Matt Turner, an economics professors at Brown University, noted if you want more cars on the road, add more lanes. But that's not what most people want. On the contrary, Transportation Secretary Pete Buttigieg said: "Connecting people more efficiently and affordably to where they need to go is a lot more complicated than just always having more concrete and asphalt out there."</p> <p>Other options include more express bus lanes, cycle lanes, walking bridges, and light rail. Basically, people need affordable options to get them out of cars and off the roads. "This is a make-or-break moment," . Ben Holland, an urban design and land use expert at clean energy non-profit RMI, told The Guardian. "How the states use highway funds will basically determine whether we meet our transportation emissions goals."</p> <p>This proposed plan will become a major part of the problem for us not meeting our emission goals. Much needs to be revised instead of thinking that in 30 years zero emission vehicles will save us.</p> <p>Widening roads and inducing traffic also has the problem of destroying neighborhoods — many times in minority communities — and also destroying important habitat directly with the roads and indirectly with encouraging more sprawling development.</p> <p>I look forward to reading how the revised plan addresses the concerns expressed above which must address both car traffic and goods movement.</p> <p>Please keep me informed on all future documents and meeting related to Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy</p> <p>The bold print in my letter comes from "Business Insider" by James Pasley (Feb 5. 2023) titled "Some of the widest highways in the US have more than 20 lanes..."</p>	<p>Comment noted. Connect SoCal envisions a future where transportation is efficient, multimodal and accessible to all. In the future, the region is envisioned to have an abundance of safe, accessible, and connected active transportation and transit/rail options. The Mobility Technical Report details the strategies (e.g., dedicated bus lanes, mobility hubs, bikeways, etc.) that support growth towards this vision. Please review this report for maps of planned active transportation and transit/rail facilities. It is important to note that the draft Connect SoCal 2024 includes \$38 billion for active transportation investments and \$385 billion for transit and passenger rail investments. Together, this accounts for over half of total Connect SoCal 2024 expenditures. For more information and final investment details, please see the Transportation Finance Technical Report.</p>
Submitted by	Hartley, Ken	Submittal 0001692
0001692.01	<p>Our family got sick and tired of being taxed to death to live in Hermosa Beach with crime getting so bad around Los Angeles. We sold our home and moved 2 corporations to Florida. Goodbye Newsom!!</p>	Comment noted.
Submitted by	Hoops, Erin	Submittal 0001695

ID	COMMENT	RESPONSE
0001695.01	<p>I am glad to see additional miles of bikeways planned. These should be protected from vehicles to ensure people of all ages and abilities can use them.</p> <p>I am disappointed that there are projects on here to widen roadways. We know that widening roadways does not reduce congestion. We need to reduce our vehicle miles travelled by 25% to meet our California Air Resources Board goal and adding additional lanes is taking us in the wrong direction.</p> <p>Please redirect these fund from road widening to solutions that reduce VMT, such as transit and bike/pedestrian safety. We do not want to spend billions of dollars on "solutions" that don't work!</p>	<p>Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. It is important to note that the draft Connect SoCal 2024 includes \$38 billion for active transportation investments and \$385 billion for transit and passenger rail investments. Together, this accounts for over half of total plan expenditures. For final Plan investment information, please see the Transportation Finance Technical Report.</p>
Submitted by	Jolles, Mark	Submittal 0001719
0001719.01	<p>I attended one of the online meetings and suggested the report provide unconstrained unassigned regional trip projections through sub areas in a map format. This is similar to what has been provided by other MPOs in their plans. This map tool provides a big picture of long range need in a simple format.</p> <p>I spoke with staff at the USDOT and FTA. They suggested the use of this map would be a typical way to objectively see if long range plans address long range needs. The SCAG staff member responding to my suggestion said he was not familiar with the nomenclature.</p> <p>The tool is basically a regional map showing trip data through sub areas after step two of the four step modeling and forecasting process. It allows for a completely objective comparison of forecasted regional need with the regional plan.</p> <p>I am concerned that SCAG does not provide this tool because it may suggest that the regional plan is not developed to address the regional need. The responding SCAG staff member seemed a bit taken back regarding my suggestion and did not ask for clarification. This tool only provides more transparency as to the effectiveness or lack of effectiveness of the long range plan. I cannot understand what objection there would be to providing such a tool as other MPOs, without question, include it in their planning documents.</p> <p>Hopefully SCAG can do better in this regard.</p> <p>Please provide this comment with the five attached single page exhibits in the public comment section of the Connect Social Draft Plan.</p> <p>Sincerely, Mark Jolles</p>	<p>Comment noted. Detailed information on SCAG's Transportation Modeling for Connect SoCal 2024 can be found in the Transportation Conformity Analysis Technical Report, see "Transportation Modeling" section. For information on how SCAG measures the performance of the regional transportation system, please see the Performance Monitoring Technical Report.</p>
Submitted by	Jolles, Mark	Submittal 0001722

ID	COMMENT	RESPONSE
0001722.01	<p>I attended a SCAG public meeting regarding the Connect SOCAL plan. At the meeting I discussed a report from the American Planning Association regarding the parking inventory in Los Angeles County. In 2010 there were 18.5 million parking spaces in the County. This equals about 200 square miles of paved parking.</p> <p>Specifically I was concerned that land-use for parking competes with other land-uses especially housing, parks, and open space and may be related to long term housing shortages. Also this inventory can be used for runoff analysis and the water shed and environmental impact. Finally supporting this land-use can impact the tax-base negatively. If these issues are of regional concern, this inventory and analysis may be of benefit in addressing regional problems.</p> <p>I suggest that SCAG include in the plan an inventory and economic analysis of the parking supply in the county and region. Other MPOs do this as a matter of course in their regional planning documents.</p> <p>Please include the two single page exhibits with this comment in the draft plan.</p> <p>Sincerely, Mark Jolles</p>	<p>As discussed in Section 6.4.4 in the Land Use and Communities Technical Report, parking management is a greenhouse reduction strategy in Connect SoCal 2024 and additional language will be added to this section to provide additional detail.</p>
Submitted by	Jolles, Mark	Submittal 0001741

ID	COMMENT	RESPONSE
0001741.01	<p>A presentation was given at one of the Connect Social meetings regarding safety and fatalities per miles traveled. The way the statistics were presented seemed to skew the impact or impression of the results. It presented fatalities and accidents per miles traveled. Trips in this region may be longer because of the greater use of autos in commuting vs more dense regions with more transit or shorter trips.</p> <p>My suggestion is to present accidents and deaths per population and per trip as well as miles traveled. Also, I suggest that transit accidents with fatalities are included to show a comparison. Some transit trips may include a combination rail, auto, pedestrian, bus, or emergency vehicle accident. It is unclear how these are included or categorized.</p> <p>I have seen photos of the Metro Long Beach Blue Line in accidents with fire trucks, buses, police cars, autos, and of course pedestrians. It is my understanding the Long Beach Blue Line is the deadliest rail line in the nation with fatalities in the 100's. One anecdote I heard was of a school child run over by a train that had his sister as a passenger.</p> <p>It is these kinds of incidences that need to be placed in a comprehensive transparent accident and fatality report. Apparently the Blue line goes through the densest communities in Los Angeles. It had initially been proposed as grade separated. Decision makers and elected officials would have more accountability regarding resource allocation for safety measures, like grade separation, if statistics were presented objectively.</p> <p>Skewed and misrepresented statistics and reports with spin are not helpful in informing about and addressing safety issues nor reducing accidents and fatalities. It is SCAG's role to present statistics and a regional plan clearly and objectively, not to "sell" them. A promotional tone creates a perception that the agency's intent is one sided. The is not an effective way to build credibility or trust in the agency. Other MPOs are more professional and objective in the tone of their plans and reports. SCAG must do better in presenting all information objectively and without "Spin".</p> <p>Please include the attached image along with my comment in the Connect Social report.</p> <p>Sincerely, Mark Jolles</p>	<p>Comment noted. Connect SoCal presents information regarding how the region is performing today relative to specific measures as a means for identifying a path forward toward achieving improved performance in the future. While statistical information is not immune to bias or misrepresentation, SCAG makes every effort to ensure that regional performance information presented in Connect SoCal is presented as objectively and accurately as possible.</p>
Submitted by	Jolles, Mark	Submittal 0001748

0001748.01.1	<p>SCAG - Southern California Association of Governments Executive Director</p> <p>Re: Regional Plan Online Meetings, Public Participation, Public Comments</p> <p>Mr. Ajise:</p> <p>I recently attended two online meetings regarding the Connect Social 2024 draft document. The presentation was mostly "spin" promoting the plan. Regional issues and needs were not objectively or honestly portrayed. Others at the meeting were also candid about the lack of integrity in the process. The structure of the meeting seemed to be to "sell" the plan rather than to encourage public participation to get critical feedback. During the meeting I and others submitted written comments critical of the discussion. Can we be certain that these comments are included in the public comment portion of the document?</p>	<p>Comment noted. All comments received during the draft Connect SoCal 2024 public review and comment period from November 2, 2023 to January 12, 2024 are accepted and responded to in writing in the Public Participation and Consultation Technical Report as part of the final Connect SoCal 2024 document.</p>
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ID	COMMENT	RESPONSE
0001748.01.2	I would like to directly submit written commentary on the plan. As well I want to suggest strategies to improve our regional mobility. After searching through several web pages, I could not find the place to do this. Please direct me to where online I can submit direct comments for the CONNECT SOCAL 2024 draft document.	Comment noted. The comment submission form was available on connectsocial.org (https://scag.ca.gov/connect-socal) from November 2, 2023 to January 12, 2024. This comment has been accepted as it was submitted to SCAG during the public review and comment period.
0001748.01.3	Finally, I have concerns that millions of residents of Los Angeles County and the region maintain vehicles, car insurance, fuel costs, parking costs, car loans, that they cannot afford. These residents are "car poor". Housing, healthcare, education, grocery, childcare, and savings resources, etc. are diverted to pay the costs of these vehicles. Millions of other residents have access to no vehicles at all. The strain on the local economy is tens of billions of dollars. A public transit system that provides high quality mobility to housing, employment, healthcare, and education does not exist, yet the resources to create one are available.	Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region. The Mobility Technical Report details strategies (e.g., dedicated bus lanes, mobility hubs, etc.) and investments (e.g., Metrolink's SCORE Program, California High Speed Rail, etc.) that support growth towards the transportation vision.
0001748.01.4	<p>Attached is a map of a model LA County Tier 1 bus routes modernization to a standard bus rapid transit system and photos of BRT stations. This model is comparable to ITDP (Institute for Transportation and Development Policy) bronze, silver, and gold standard systems in 100's of cities globally.</p> <p>LA Metro Tier 1 bus routes can be converted to a comparable BRT system. This solution provides a high quality mobility option for millions of Los Angeles County residents. It is 80% fundable by the Federal Government. Please include the attachments as public comment on the draft document.</p>	Comment noted. SCAG's Transit Priority Best Practices Report was published in 2022 as part of the Regional Dedicated Transit Lanes Study. It identified a range of best practices and lessons learned from the development and implementation of dedicated bus lanes and other transit speed and reliability improvements relevant to the SCAG region. Best practices from the Institute for Transportations and Development Policy (ITDP) were reviewed. This document is available online here: https://scag.ca.gov/post/transit-priority-best-practices-report-0 .
0001748.01.5	<p>Thank you for providing your email online. This is a good step in facilitating communication between SCAG and the public.</p> <p>Sincerely, Mark Jolles</p>	Comment noted.
Submitted by	Jolles, Mark	Submittal 0001749
0001749.01	Additional attachments to be included with comment 0001748	Attachments received in relation to comments in Submission 1748.
Submitted by	M, C	Submittal 0001681
0001681.01	<p>Dear Agencies,</p> <p>Please note that Southern California truly needs a comprehensive and common sense public transportation system.</p> <p>While it is great that the governor and every other elected public official claims that they are doing a great job, they have been unable to provide basic services to taxpayers such as me, who have reduced quality of life due to the traffic, congestion, and lengthy commutes I am forced to endure due to California public officials being unable to solve basic problems which have been successfully implemented in the rest of the developed world. The governor and everyone else paid by the state need to earn their pay and the lavish lifestyles they have become reliant on due to their positions.</p> <p>Thank you.</p> <p>A concerned voter and resident of Southern California</p>	Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas. The Mobility Technical Report details the strategies (e.g., dedicated bus lanes, mobility hubs, etc.) and investments that support growth towards this vision.
Submitted by	Miller, Jay	Submittal 0001711

ID	COMMENT	RESPONSE
0001711.01	<p>My name is Jay Miller, and just recently started with the Inland Social Housing Collective, which is an organization that has been growing for the last decade plus and working to coordinate many different aspects of for-profit and non-profit and government agencies within the Riverside and San Bernardino Counties to help with the housing affordability, and, which in turn then helps with some of the transportation issues.</p> <p>One of the largest issues that I have not heard addressed by very many people in our Southern California region, or in the state or nation in regard to transportation and housing, which are definitely linked, because when you put jobs far away from houses where people can live, you need, obviously, some form of transportation to get the people to those jobs.</p> <p>What we're seeing is that cities around our region, as well as in many other places are motivated to put together commercial developments much more readily than residential developments. And the primary reason is, that city leaders I've talked to many mayors and council people and managers are much more motivated by the commercial developments because they generate much higher tax revenues and help the cities pay their bills.</p> <p>Residential developments produce little, if any, revenue for the cities. And it is something that has been ongoing for several decades now. And we need to find a solution so that there is a better balance, and the cities can obtain the funding that they need, both from residential and from commercial development.</p> <p>And yet, another question that I would have is if a city is completely built out for all of their residential zoning...should that city responsibly be adding more commercial development and jobs within their city limits? Or should they revisit and reconsider how their plan is going to fit into a long-term plan for both their own city and for the region? So that in the future, hopefully, we put jobs and houses much closer together than we have been in the last few decades.</p>	<p>Comment noted. Connect SoCal recognizes the jobs-housing imbalance as part of our Equity Technical Report and under the Equity Analysis in section 5.2 of the Main Book. This analysis found that jobs-housing fit increased between 2010 and 2019, while low wage jobs-housing fit decreased during the same period. Additionally, coastal counties have a substantial concentration of low-wage jobs, but lack an adequate number of affordable rental units, while inland counties have a substantial concentration of affordable rental units and workers, relative to the number of low-wage jobs that match their skills. While SCAG does not have land use authority to dictate how local jurisdictions should grow, nor do we have the capabilities to restructure how local jurisdictions are financed, one of the overarching themes of Connect SoCal is to place housing closer to jobs in order to help reduce our greenhouse gas emission targets.</p>
Submitted by	Moreau, Austin	Submittal 0001723
0001723.01	<p>Far and away, the most important thing any organization in California can be doing is getting more housing built. Whether by hook or by crook, intervention or getting out of the way, no option should be off the table in this pursuit. Aside from the ability to improve the regional economy with an organic source of growth resulting in greater ridership and tax collection there is a moral obligation. As climate change becomes a greater challenge for humanity, Southern California has the opportunity to open its arms to people seeking refuge. Further, living somewhere with little need for A/C or heat compared to anywhere else is something we should all strive towards getting as many people as possible to do.</p>	Comment noted.
Submitted by	Nielsen, Donald	Submittal 0001702
0001702.01	<p>The Plan needs to identify water purveyor consolidation within unincorporated counties as LAFCo policies (especially in Ventura County) extremely limit or outright prohibit infill development within existing unincorporated urban communities.</p>	Comment noted.

ID	COMMENT	RESPONSE
0001702.02	<p>A transportation project should be considered along the Highway 126 corridor from Ventura to Santa Clarita. There is an existing rail line from Ventura to Piru, and the rail line could easily be extend into LA County to connect with other existing rail in Santa Clarita. Then Metrolink could have another northern line linking Ventura, Santa Paula, Fillmore, Piru, and Santa Clarita (this could possibly then turn into an express train to Downtown LA). The traffic volumes from new construction and increased tourism (especially on hot days), will help to justify this new project. Plus the project would have reduced costs as a majority of the line is already built out, the main costs would come from building out the connection from Piru to Santa Clarita and new staff.</p>	<p>Comment noted. Ventura County Transportation Commission is considering rail service improvements along the Santa Paula Branch Line in Ventura County, which aligns with your comment. See Project ID #S5120002 in Table 3 of the Unconstrained Project List. Although the project is listed as part of the Project List Technical Report, it is under the unconstrained section.</p>
Submitted by	Norlen, Carl	Submittal 0001725
0001725.01	<p>There are many good ideas in this plan. Creating dedicated lanes in freeways for Bus Rapid Transit would be a great way to reduce VMT and GHG emissions. Unfortunately it appears the plan focuses mainly on converting HOV lanes into fee generating express lanes. I would dedicating the majority of resources towards creating decorated transit lanes on freeways instead of express lanes that will serve mostly single occupancy vehicles and may lead to increased VMT which does not align with statewide goals for a 30% reduction in VMT by 2050. If additional revenue is needed express lanes with fees could pay a role, but they should not be prioritized over lanes for bus rapid transit that connects the Southern California region.</p>	<p>Comment noted. SCAG's support for dedicated transit lanes and transit priority treatments is addressed in Chapter 2, page 96 of the Mobility Technical Report. In April 2023, SCAG completed and published a Regional Dedicated Transit Lanes Study, https://scag.ca.gov/sites/main/files/file-attachments/23-3078-dedicated-transit-lanes-study-final.pdf, further highlighting our efforts to improve transit speed and reliability. The Transit Priority Best Practices report published in 2022 as part of the Dedicated Transit Lanes Study - https://scag.ca.gov/sites/main/files/file-attachments/3038_scag-rdtlstransitpriority_final.pdf?1657834676; also highlights transit priority treatments.</p>
0001725.02.1	<p>It appears that the project must and financial summary do not align with the goals of the plan to reduce VMT and GHG emissions. Of the approximately \$450 dedicated towards maintaining existing transit infrastructure it appears that only about 6% of the budget is dedicated to non-highway based transportation. It will be impossible to reduce VMT and GHG emissions by investing so little in updating our transit infrastructure to move away from single occupancy vehicles. I would recommend reallocating a large portion of funds towards converting highway lanes into dedicated bus rapid transit lanes that connect all parts of the Southern California region.</p>	<p>Comment noted. Of the approximately \$450 billion dedicated towards maintaining existing transportation infrastructure, more than 83 percent of the draft Plan budget is dedicated to non-highway based transportation. Expanding the region's dedicated lanes network—including new bus rapid transit, dedicated bus lanes, express bus service on managed and express lanes—as well as the region's urban and passenger rail network and transit/rail signal priority treatments is an implementation strategy included in Connect SoCal 2024. For final Plan Investment information, please see the Transportation Finance Technical Report.</p>
0001725.02.2	<p>If possible it would also be helpful to dedicate funds to increasing the frequency of trains through the Metrolink regional rail system. Maintains existing infrastructure is important, but should not pursued at the expense of more efficient modes of transportation such as bus rapid transit and regional rail.</p>	<p>Comment noted. Connect SoCal 2024 includes investments in Metrolink's Southern California Optimized Rail Expansion (SCORE) Program, which is currently being implemented. SCORE includes new grade crossings, station and signal improvements as well as track additions that will allow much greater bi-directional train frequency and accelerate progress towards its zero-emissions future. Examples of projects include the Simi Valley Double Track, Chatsworth Station improvements, El Monte Siding Extension Project, and Rancho Cucamonga Siding Extension Project.</p>
Submitted by	Norman, Marven	Submittal 0001750
0001750.01	<p>Letter and attachments.</p> <p>I am writing to provide comments on the 2024 Connect SoCal plan which has been made available for public review and comment. Based on the information contained in the main document as well as the Technical Reports, the Plan endeavors to address many complex topics with far-reaching impacts. Undoubtedly, the Plan will provide some improvements over what the region currently experiences. However, it remains woefully short on truly meeting the needs of the region in a way that would provide a true change of the experience of getting around. The glaring issue of the current plan is the lack of considering the VMT reduction goals of the CARB 2022 Scoping Plan. In 2022, CARB passed its most recent Scoping Plan which identified a target of reducing per-capita VMT in the state by 25% below 2019 levels by 2030 and a total of 30% below 2019 levels by 2045. While Connect SoCal does identify that some level of VMT reduction would occur due to the Plan (page 179), the reduction identified would come far short of meeting the goal of the Scoping Plan both in amount and time.</p>	<p>Comment noted. The Scoping Plan, developed by CARB, details how the State will achieve its GHG emission reduction targets. While VMT reduction targets and strategies are included in the Scoping Plan, these targets are not regulatory requirements, but will inform future planning processes. Just as prior Scoping Plans informed the current 19 percent GHG emission reduction target that CARB set for SCAG, CARB may consider the 25 percent VMT reduction target in the 2022 Scoping Plan when setting new GHG emission reductions for SCAG in 2026.</p>

ID	COMMENT	RESPONSE
0001750.02	<p>Though the goal is ambitious, it is within reach as long as the right steps are taken by SCAG and local agencies, but it is a goal which simply cannot be put off until the next Connect SoCal cycle to address. The most critical issue is to prioritize VMT-reducing projects. As noted several times in the various Connect SoCal documents, there is currently an extensive road network spanning tens of thousands of miles and reaching to the hinterlands of the region and the network continues to expand. However, the same simply cannot be said for the transportation network for those who travel by other means. The Plan does acknowledge this, but the provided remedies are woefully inadequate, particularly outside of the LA Basin and Orange County. Map 2-4. 2050 High Quality Transit Corridors indicates that there will be only a handful of those corridors throughout the region in that year while leaving millions of people with no access to those amenities, including in some of the fastest-growing areas of the SCAG region.</p>	<p>Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. It is important to note that the draft Connect SoCal 2024 includes \$38 billion for active transportation investments and \$385 billion for transit and passenger rail investments. Together, this accounts for over half of total plan expenditures. SCAG's methodology for identifying High Quality Transit Corridors (HQTCS) and major transit stops is documented in the Mobility Technical Report's Appendix #5. SCAG's assessment of HQTCS is based on a snapshot of 2019 data and/or of planned 2050 transit service based on information transit operators share. For final Plan investment information, please see the Transportation Finance Technical Report.</p>
0001750.03	<p>While it is good to see that the Plan notes that improvements are being made, there appears to be a lack of vision at SCAG, the regional transportation agencies, and local agencies. For example, RCTC is planning Coachella Valley rail service and is actively seeking grants for Tier II environmental clearance, yet their plan for that service is woefully inadequate to meeting any real transportation needs despite being predicated on well over a billion dollars in investment for new track. However, with proper planning, that investment could establish a real travel option with multiple daily departures which would reduce driving from new communities going up in the Cherry Valley/Yucaipa/Beaumont/Banning region where people then still drive to work in points west, increasing VMT. Were RCTC to plan that service properly such as providing hourly departures (potentially to include working with SBCTA/LA Metro/Metrolink to route some trains over San Bernardino Line as well as with Imperial County on the other side to extend service to Calexico), there would be a real travel option for the thousands of people moving to the Pass communities.</p>	<p>Commented noted. Several Connect SoCal strategies highlight support for transit/rail expansion. For example, the fourth strategy on p. 125 under Transit and Multimodal Integration is: "Expand the region's dedicated lanes network—including new bus rapid transit, dedicated bus lanes, express bus service on managed and express lanes—as well as the region's urban and passenger rail network and transit/rail signal priority treatments. Improve transit/rail frequency, reliability, and fare and scheduling integration across operators." SCAG regularly collaborates with transit/rail operators and County Transportation Commissions via its Regional Transit Technical Advisory Committee.</p>
0001750.04	<p>Other rail opportunities include reconfiguring the Ontario area to better connect Brightline West, CAHSR Phase 2 to San Diego, and the Metrolink Riverside Line (as well as rerouting it to the west as well) to provide a seamless high-quality connection to points both elsewhere in the region and beyond (i.e. Las Vegas, San Diego). Closing the gap between the Metro C Line and LOSSAN in Norwalk is also crucial and cannot wait until the 2050s to be completed. Instead, it should be accelerated and completed as soon as possible, potentially by using toll revenue from the planned HOT lanes on I-105 to fund it.</p>	<p>Comment noted. Connect SoCal includes Phase 1 of California High-Speed Rail, with a completion date of 2033 as identified in the California High-Speed Rail Authority's 2018 Rail Business Plan. Connect SoCal also assumes Brightline West will operate high speed rail service between Las Vegas, the Victor Valley and Rancho Cucamonga by 2030. Funding for the Norwalk Metro C Line extension is constrained in part by the voter approved Measure M Expenditure Plan. SCAG will continue to coordinate with regional rail stakeholders to ensure opportunities for improved connections are pursued.</p>
0001750.05	<p>In addition to the greater investment in rail, we also need better bus services. The Project List includes many "widening" projects all across the region which would add lanes. Many of these should simply be nixed, but if they really must go through, they should happen as bus-only lanes to help speed up transit service and make it a more viable option. This is especially true in areas where two or more bus routes use the same portion of a route. This should not be considered "bus rapid transit" but simply a commonsense approach to making sure that transit can move and is viable.</p>	<p>Comment noted. As described in the Mobility Technical Report's Transit/Rail Chapter, in 2023, SCAG completed the Regional Dedicated Lanes Study, which plans for a regional network of dedicated bus lanes and other transit priority treatments to support enhanced transit services, and improve mobility, accessibility, and sustainability. The Study's recommended projects were integrated into Connect SoCal and the Plan's strategies support these projects. For example: "Expand the region's dedicated lanes network—including new bus rapid transit, dedicated bus lanes, express bus service on managed and express lanes—as well as the region's urban and passenger rail network and transit/rail signal priority treatments. Improve transit/rail frequency, reliability, and fare and scheduling integration across operators."</p>

ID	COMMENT	RESPONSE
0001750.06	<p>As referenced above, there are many areas of the region which are still growing with greenfield development. These are opportunities to do far better than the status quo for the region and build communities which naturally foster lower VMT daily life. This is crucial for several reasons. Not only is it important to make sure that we are doing as much as possible to lower VMT from areas which often increase it, but research has shown that when people are making big life changes presents a prime opportunity for them to also consider new ways to get around. Building communities which make it easier to walk, bike, or use transit instead of drive will be indispensable to achieving the VMT reduction targets.</p>	<p>Comment noted. Natural and farm lands preservation is one of the plan's core strategies for achieving VMT reduction. For more detail, please see Natural and Agricultural Lands Preservation policies in Chapter 3 and section 6.3 of the Land Use and Communities Technical Report.</p> <p>Connect SoCal's mobility goal is to build and maintain a robust transportation network, one that is well integrated, multimodal, and supports modal shifts and reductions in Vehicle Miles Traveled (VMT). Multiple Connect SoCal strategies support this goal. Please refer to the Complete Streets and Transit and Multimodal Integration strategies. Please also refer to the 15-Minute Communities strategies, which detail how the region will support the development of communities where people can access all their most basic, day-to-day needs within a 15-minute walk, bike ride, or roll from their home.</p>
0001750.07	<p>Part of what is needed for achieving the VMT reduction targets is to rethink how the transportation network itself is constructed. While it is concerning to see the vast number of widening projects in the Project List, many of those projects can be repurposed to be beneficial to the goal of lowering VMT, instead of the hinderance which they currently would be, by updating standards which are used to design and build roads. In 2022, Senate Bill 932 (Portantino) was passed which mandated that starting in 2025, all general plan mobility plans must include essentially an active transportation plan and vision zero/zero deaths goals. While SCAG has historically been the source of a fair amount of complete streets planning in the region, I will say from personal experience in a number of them that the output is still lackluster in terms of what is truly needed due to a variety of factors. Thus, with time already ticking for the 2030 deadline, jurisdictions cannot wait until the next time they are doing their General Plan updates to begin to address SB 932 and any currently undergoing an update which technically do not have to comply if finished within the next 11 months nevertheless still should as getting good plans available is essential so that they can start impacting construction which realistically at this point, might not even happen until maybe the 2028 timeframe at earliest.</p>	<p>Comment noted. The Scoping Plan, developed by CARB, details how the State will achieve its GHG emission reduction targets. While VMT reduction targets and strategies are included in the Scoping Plan, these targets are not regulatory requirements, but will inform future planning processes. Just as prior Scoping Plans informed the current 19 percent GHG emission reduction target that CARB set for SCAG, CARB may consider the VMT reduction targets in the Scoping Plan when setting new GHG emission reductions for SCAG in 2026.</p> <p>In accordance with state and federal requirements, Connect SoCal must take into account all regionally significant surface transportation projects and strategies proposed to be funded by federal, state, local, and private sources over the life of the Plan. The Project List Technical Report describes those transportation projects. Since the SCAG region must also demonstrate transportation conformity, the Project List must include additional detail on projects that can be modeled. Non-automobile projects like investments in active transportation typically cannot be modeled directly for transportation conformity and are therefore underrepresented in the project list.</p>
0001750.08	<p>As noted in the report, San Pablo Avenue in Palm Desert is a pretty good regional example of the type of changes we need and which the widening projects in the Project List really should be modeled after. That should be standard practice. Further benefits can be realized by adopting standards based on research-proven designs to both improve safety of the transportation system as well as convince more people to not use their cars, particularly for those 59% of trips which are less than three miles.</p>	<p>Comment noted. The Mobility Technical Report covers numerous strategies to encourage and support walking, biking, using micromobility, and riding transit, which contribute to reducing vehicle miles traveled (VMT). SCAG provides and facilitates funding opportunities, such as the state/regional Active Transportation Program, to support projects and plans that contribute to reducing VMT and will continue to encourage and keep track of these projects.</p>
Submitted by	Roberts, Tyler	Submittal 0001738
0001738.01.1	<p>Under the current plan, it appears that far more money goes into 'goods movement' under the spending plan, which doesn't clarify whether or not this consists of road widening and capacity increases, instead of focusing on active transportation, roadway safety improvements, and public transit.</p>	<p>The draft Connect SoCal 2024 includes \$38 billion for active transportation investments and \$385 billion for transit and passenger rail investments. Together, this accounts for over half of total plan expenditures. The draft Connect SoCal 2024 includes about \$65 billion for goods movement, or about eight percent of Plan investments. Goods movement investments include roadway access to major goods movement facilities, freight corridor systems, off-dock and near-dock intermodal facilities, mainline rail, on-dock rail, rail access improvements to seaports, rail-highway grade separations, and other strategies including bottleneck relief, technology, and other initiatives. For more information, please see the Goods Movement and Transportation Finance Technical Reports.</p>

ID	COMMENT	RESPONSE
0001738.01.2	<p>In 2023, over 300 people were killed in Los Angeles city alone, this is not factoring other regions. Our current issue with our roadways is that we prioritized speed and throughput over safety and alternative transportation options, which ends up leading to more vehicle miles traveled, which results in more pollution, traffic congestion during peak travel times, and higher speeds traveled, with increased fatality rates on off-peak times.</p>	<p>Comment noted. Recognizing the transportation safety challenges confronting the region, SCAG adopted a resolution in 2021 affirming its regional leadership role and commitment to advancing transportation safety with a Regional Safety Policy that endorses Toward Zero Deaths (TZD) as part of a comprehensive effort to strive to achieve zero transportation-related fatalities and serious injuries in the SCAG region by 2050, if not sooner. SCAG has several efforts to advance roadway safety for people walking, biking, and riding transit. Each year, SCAG evaluates the region's transportation-related fatalities and serious injuries and develops targets for the region. In addition, SCAG secures and distributes funding for alternative transportation options (walking, biking, using micromobility, and riding transit) on an ongoing basis. In 2023, SCAG secured a \$12 million Safe Streets and Roads for All (SS4A) federal grant to develop a Regional Safety Action Plan. The grant funds also will be used to expand SCAG's Go Human program, including the piloting of local safety campaigns and Complete Streets pop-up demonstration activities, and funding up to 15 mini-grants to community-based organizations. The grant will also support the piloting of quick build demonstration activities through a competitive call for projects. In addition, SCAG facilitates the state/regional Active Transportation Program to ensure grant funds are distributed throughout the SCAG region to support active transportation improvements.</p>
0001738.01.3	<p>In order to meet CARB emission standards, shorter trips should be served by pedestrian and bike riding, with emphasis on roadway design that de-emphasizes speed of automobiles, while longer trips are oriented around the public transit network, whether that be bus-only lanes, light rail / rapid transit, or suburban rail. Similarly, housing projects, both urban and suburban, must be focused around bus and rail stations and not highway exits and car-dependent arterial roadways.</p>	<p>Comment noted. Connect SoCal envisions a future where transportation is efficient, multimodal and accessible to all. In the future, the region is envisioned to have an abundance of safe, accessible, and connected active transportation options. Integrated transit networks will provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas. The Mobility Technical Report describes in more detail the Plan's short trips (e.g., bike and pedestrian infrastructure (section 3.15.3), first/last mile treatments (section 3.2), Safe Routes to School (section 3.2), and Transit Oriented Development (section 2.11) strategies.</p>
Submitted by	Samdarshi, Mihir	Submittal 0001704
0001704.01	<p>The plan seems to heavily focus on the upcoming population growth, and how that will present challenges with transit. However, current language in the document suggests that there will be an "accommodation" of the existing infrastructure to supply the larger population. This suggests a widening of existing roadways, etc. However, I would like to suggest adjusting this language to re-iterate that for urban areas, the focus should be on reducing the number of cars on the road, and making areas more walkable/public transit accessible.</p>	<p>Comment noted. Connect SoCal describes a vision of the future, one where transportation is efficient, multimodal, and accessible to all. This future includes integrated transit networks that provide seamless connections throughout the region and development of 15-minute communities, places where people can access all of their basic, day-to-day needs, services and amenities within a 15-minute walk, bike or roll from their homes. These are places where people are able to make fewer and/or shorter trips due to the proximity of activity centers and destinations. The Mobility Technical Report details additional strategies (e.g., dedicated bus lanes, mobility hubs, etc.) and investments that support growth towards this vision.</p>
Submitted by	Sandbrook, Richard	Submittal 0001672
0001672.01	<p>my comment may be summed up by simply saying "MORE RAIL, LESS TRUCKS" !</p> <p>get more semis off our freeways by a major change in our rail systems. Too many semis on our freeways.</p>	<p>Comment noted. As stated in the report, there are multiple supply chain linkages with respect to how goods are distributed both locally and outside of the region, as explained in Figure 1. Connect SoCal identifies a comprehensive set of strategies addressing safe and efficient freight movement on both trucks and on rail, including strategies to support the transition to clean transportation technologies.</p>
0001672.02	<p>encourage the construction of starter homes on large lots, similar to what was done after WW2.</p>	<p>Comment noted. SCAG supports programs and policies that promote increased housing supply, choice, and affordability.</p>
0001672.03	<p>rule number one;</p> <p>small government is good government.</p> <p>less regulation, better enforcement of violations.</p> <p>the smaller the bureaucracy the better</p>	<p>Comment noted.</p>

ID	COMMENT	RESPONSE
Submitted by	TC	Submittal 0001661
0001661.01	<p>Under Table 13, Jurisdiction-level growth forecast, in the Demographics and Growth Forecast technical report, growth projections for Years 2035 or 2050 are not show under the "population" column. I would like to see those added into the table as it was shown previously in the SoCal Connect 2020. Thank you!</p>	<p>In contrast to Connect SoCal 2020, the local review process for Connect SoCal 2024 did not include a review of future year population projections. Instead, these were developed by SCAG based on local household projections. As such only 2019 (base year) population was included in the table. However, 2035 and 2050 population projections by jurisdiction and Tier2 Transportation Analysis Zone (TAZ) are currently available in Excel format at https://scag.ca.gov/local-data-exchange and final plan versions will be included alongside supplemental plan material online.</p>
Submitted by	Wilson, Patrick	Submittal 0001679
0001679.01	<p>The planned Express Lanes at SR-60 from I-15 to the SR-91/I-215/SR-60 Junction in Riverside will only serve to increase congestion Eastward into Moreno Valley unless the additional project I'm about to suggest is also implemented.</p> <p>I propose eliminating the center median along SR-60/I-215 from the SR-91/I-215/SR-60 Junction near Downtown Riverside to the SR-60/I-215 split near Raceway Ford. In its place, we could re-align the existing HOV lane on top, and in the process, add an additional general purpose lane in each direction.</p> <p>As it currently stands, this is a huge bottleneck zone. At the Eastern end, 2 Northbound I-215 lanes merge with 2 Westbound SR-60 lanes plus an HOV lane. 5 lanes going in one direction at exit 30A narrow down to 4 by exit 30B, and the bottleneck doesn't open up again until exit 32, University Ave. Eliminating the center median on this stretch, realigning the HOV lane on top, and adding the additional general purpose lane would maintain the 5 lane Westbound continuity beyond University Ave, where the highway is no longer landlocked on either side.</p> <p>On the Eastbound side, the proposed Express Lanes terminating at the SR-91/I -215/SR-60 Junction would only increase the amount of vehicles caught in the existing bottleneck, making traffic backups worse than they currently are. By mimicking my proposed Westbound realignment onto the Eastbound side, additional congestion from the Express Lanes can be minimized.</p> <p>The best part about my proposed realignment is that it uses existing land that is already used for the highway. It would just need to repurposed from a median shoulder to a travel lane. This would minimize project costs to the county and the taxpayer. Removing the center median in my opinion is an obvious solution, especially considering SR-60 East of Downtown Riverside and I-215 North of Downtown Riverside both do not have center medians. They instead place the HOV lane right next to the median retaining wall, which again, is exactly the solution I'm suggesting.</p> <p>I will say I would love to take a Metrolink train to work instead of driving, but even though I live 2 miles from the Perris South station, there's no timely way to commute to my job in Bloomington using public transportation. So with a vested interest in this roadway section, I believe my proposed realignment of the SR-60/I-215 segment from Exit 30A to Exit 32 is a cost effective solution that I believe would instantly show positive results.</p>	<p>Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes. Your comment will be available for Riverside County Transportation Commission's (RCTC's) review. SCAG will continue to work with RCTC on updates to the Project List as needed.</p>
Submitted by	Anonymous	Submittal 0001680
0001680.01	<p>No express lane privileges for fees or electric vehicles. These only serve the wealthy. Unfair. When diamond lanes were first approved by voters we were promised they would never be used that way. That promise was violated. All lanes for all people.</p>	<p>Comment noted. Express lanes in the SCAG region continue to provide toll free travel for qualified carpools. Many express lanes built in the region use toll receipts to pay construction debt service. Compared to using general taxes (even on residents without a car) to add this capacity, use of tolling is both fairer and more equitable.</p>





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