

# CONNECT SOCIAL 2024

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

## PUBLIC PARTICIPATION & CONSULTATION

### Comment Letters, A-N

APPENDIX 4A OF 5

ADOPTED APRIL 4, 2024



# Public Participation & Consultation

## Comment Letters, A-N

APPENDIX 4A OF 5

INDEX REPORT	i
COMMENT LETTERS	1



AFFILIATION	SUBMITTAL ID	PAGE NO
California Air Resources Board	0001735, 0001776	1
Caltrans	0001691, 0001726, 0001732, 0001758, 0001759, 0001762, 0001764, 0001765	6
Center for Community Action and Environmental Justice	0001709, 0001743	75
Center for Demographic Research	0001706	77
City of Anaheim	0001772	79
City of Eastvale	0001714	81
City of Huntington Beach	0001761	83
City of Irvine	0001721	88
City of Murrieta	0001747	191
City of Oxnard	0001669, 0001710, 0001712, 0001828	219
City of Riverside	0001737	221
Federal Aviation Administration	0001673	223
Five Point Operating Company, LP	0001675	225
Friends of Harbors, Beaches and Parks	0001753, 0001755, 0001685, 0001686, 0001687, 0001688, 0001689	230
Highland Fairview	0001821	271
Hills for Everyone	0001763	281
House Farm Workers	0001717	292
Los Angeles County Department of Regional Planning	0001684	295
Los Angeles World Airports	0001817	297
Naval Base Ventura County	0001818	300
Neighborhood Housing Services of the Inland Empire (NHSIE)	0001746	302



Gavin Newsom, Governor  
Yana Garcia, CalEPA Secretary  
Liane M. Randolph, Chair

January 12, 2024

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

Dear Ms. Jepson:

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.

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.

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).

Southern California Association of Governments Connect SoCal Team

January 12, 2024

Page 2

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.<sup>1</sup> 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.

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.

## Policy analyses of GHG emission reduction strategies

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.

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.

- **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

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<sup>1</sup> Government Code § 65080(b)(2)(J)(i)

Southern California Association of Governments Connect SoCal Team

January 12, 2024

Page 3

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.

- **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.
- **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.
- **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

Southern California Association of Governments Connect SoCal Team

January 12, 2024

Page 4

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.

- **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.
- **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.

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.

- **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

Southern California Association of Governments Connect SoCal Team

January 12, 2024

Page 5

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.

## Conclusion

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.

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 [lezie.kimura@arb.ca.gov](mailto:lezie.kimura@arb.ca.gov).

Sincerely,

*Lezie Kimura Szeto*

Lezie Kimura Szeto, Manager, Sustainable Communities Policy & Planning Section

## California Department of Transportation



January 12, 2024

**FROM:** HQ Division of Transportation Planning, Office of Rail Planning & Implementation  
District 7 Division of Planning

**TO:** Southern California Association of Governments

**RE:** Review Comment on SCAG Draft 2024 SoCal RTP/SCS Project List Technical Report

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.

**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.

**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.

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.

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

## California Department of Transportation

DISTRICT 7  
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January 12, 2024

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

Dear Mr. Ajise:

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

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

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

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

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

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

Sincerely,

*Marlon Regisford*

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

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



Mr. Kome Ajise  
January 12, 2024  
Page 2

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

Attachments

Mr. Kome Ajise  
January 12, 2024  
Page 3

## **ATTACHMENT A: COMMENTS**

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

Mr. Kome Ajise  
January 12, 2024  
Page 4

## Caltrans Headquarters

### HQ Office of Regional Planning and HQ Air Quality Branch

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

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

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

#### **Consultation and Cooperation:**

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

#### **Modal:**

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

#### **Financial:**

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

Mr. Kome Ajise  
January 12, 2024  
Page 5

### **Transportation Conformity Analysis:**

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

### **2023 FSTIP Finding:**

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

## **HQ Office of Rail Planning and Implementation**

### **Comments on Draft Connect SoCal 2024**

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 6

2. Pg35/Climate Action - Connection to Climate Action Plan for Transportation Infrastructure (CAPTI) is relevant. Recommend addressing how the RTP aligns with CAPTI guiding principles throughout document as appropriate. Link: <https://calsta.ca.gov/subject-areas/climate-action-plan>
3. Pg46/Funding the System - Consider expanding on what innovative and strategic options may be needed (not just the need for new funding); consider exploring specific strategies for leveraging federal funds as well.
4. Pg62/Collaboration and Policy - Consider including reference to include crucial to supporting State goals.
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.
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.).
7. Pg88 - Consider identifying how specific policy's and/or strategies align with State objectives/planning documents.
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.
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.
10. Pg91/Focusing on System Efficiency - Recommend inclusion of multi-modal service integration (not just integrated pricing strategies or seamless trip planning).
11. Pg101 - Consider discussion of complete streets and access to transit with the TPAs.
12. Pg109/Clean Transportation - This section should address strategic investments for transit and rail, not just passenger vehicles.
13. Pg114 - Consider adding "Collaboration between stakeholders for scheduling and increasing ridership"
14. Pg114/Transit and Multi Modal Integration - Service integration is needed, not just connectivity.
15. Pg114/Transit and Multi Modal Integration - Service integration between modes is also needed (i.e. timing of connections not just connections).
16. Pg152/Funding/Investment Strategies - Suggest including strategies for how to most effectively leverage federal funds.

## **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.

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 7

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

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

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

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

## Chapter 2: Our Region Today

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

## Chapter 3: The Plan

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

## Chapter 4: Financial Summary

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 8

- 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>  
 Also, please indicate and clarify in the Y-axis of the graph if the value is in dollar amount millions or thousands.  
*Suggested Action:* We recommend to include the recent 2022 Caltrans Construction Cost Index in the graph: <https://ppmoe.dot.ca.gov/des/oe/docs/CCI.pdf>

### Comments on Transportation Conformity Analysis Technical Report

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 9

Electric Vehicle (EV) Infrastructure: Installing and expanding electric vehicle charging infrastructure to encourage the use of electric vehicles and reduce emissions from traditional gasoline-powered vehicles.

**Green Roofs and Cool Pavements:** Incorporating green roofs and cool pavement technologies to mitigate the urban heat island effect and improve air quality in densely populated areas.

### Comments on Congestion Management Technical Report

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

### Comments on Performance Monitoring Technical Report

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

### Comments on Mobility Technical Report

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

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



Mr. Kome Ajise  
January 12, 2024  
Page 10

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

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

### **Comments on Demographics and Growth Forecast Technical Report**

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

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

Mr. Kome Ajise  
January 12, 2024  
Page 11

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

### Comments on Project List Technical Report

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 12

## Caltrans District 7

### District 7 Climate Change Adaptation

#### General Comments on Draft Connect SoCal 2024

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

### District 7 Multi-Modal System Planning

#### Comments on Draft Connect SoCal 2024

##### Chapter 1: Executive Summary

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

##### Chapter 2: Our Region Today

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 13

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

### **Chapter 3: The Plan**

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

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

Mr. Kome Ajise  
January 12, 2024  
Page 14

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

#### **Chapter 4: Financial Summary**

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

#### **Supplementals**

- Pg 199 through 222 - Very useful section.

## **District 7 Freight Planning**

### **Comments on Draft Connect SoCal 2024**

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 15

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

### Comments on Aviation Airport Ground Access Technical Report

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

Mr. Kome Ajise  
January 12, 2024  
Page 16

### Comments on Goods Movement Technical Report

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 17

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



Mr. Kome Ajise  
 January 12, 2024  
 Page 18

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 19

parts of the SCAG area to the same degree or is this discussion more applicable to some parts of the SCAG area than others? If it is more applicable to certain parts of the SCAG area, could these areas be identified?

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 20

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 21

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 22

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

## **District 7 Special Projects Office (Transportation Planning)**

### **Comments on Draft Connect SoCal 2024**

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

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 23

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

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

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

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

### **District 7 Division of Program and Project Management**

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 24

## Caltrans District 8

### District 8 Office of System Planning

#### Comments on Connect SoCal 2024

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

### District 8 Office of Regional Planning

#### General Comments on Connect SoCal 2024

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 25

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

### **Project Specific Comments on Connect SoCal 2024**

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

### **District 8 Active Transportation Branch**

#### **Comments on Mobility Technical Report**

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

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



Mr. Kome Ajise  
 January 12, 2024  
 Page 26

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

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 27

### Comments on Equity Analysis Technical Report

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

Mr. Kome Ajise  
January 12, 2024  
Page 28

- 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).

Mr. Kome Ajise  
 January 12, 2024  
 Page 29

## **Caltrans District 11**

### **District 11, Various Offices**

#### **Comments on Project List Technical Report**

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

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

### **District 11 Office of Multi-Modal System Planning**

#### **Comment on Connect SoCal 2024**

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

#### **Comments on Project List Technical Report**

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

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

#### **General Comments**

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 30

## Caltrans District 12

### District 12, Various Offices

#### Comments on Connect SoCal 2024

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

#### General Comments on Connect SoCal 2024

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

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

Mr. Kome Ajise  
January 12, 2024  
Page 31

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

### **Comment on Congestion Management Technical Report**

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

### **Comment on Mobility Technical Report**

- Page 203, Map 4-2 “SCAG Regional Express Lanes Network” - The limit of the “Planned\_DualLane\_Segments\_2” line on I-5 in Orange County should end at SR 91. The thick blue line seems to be going beyond SR 91. Blue points representing “Proposed HOV-HOT” should be added to interchanges at I-5/SR 91, I-5/SR 57, and I-5/SR 55.

### **Comments on Project List Technical Report**

#### **Financially Constrained Projects:**

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

Mr. Kome Ajise  
January 12, 2024  
Page 32

## **ATTACHMENT B: COMMENTS**

### **Program Environmental Impact Report (PEIR)**

Mr. Kome Ajise  
January 12, 2024  
Page 33

## **Caltrans District 11**

### **District 11, Various Offices**

#### **Comments on Program Environmental Impact Report**

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



Mr. Kome Ajise  
January 12, 2024  
Page 34

## **Caltrans District 12**

### **District 12, Various Offices**

#### **Comments on Program Environmental Impact Report**

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

### **District 12, Various Offices**

#### **General Comments on Program Environmental Impact Report**

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

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

## California Department of Transportation

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January 12, 2024

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

Dear Mr. Ajise:

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

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

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

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

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

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

Sincerely,

*Marlon Regisford*

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

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Mr. Kome Ajise  
January 12, 2024  
Page 2

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

Attachments

Mr. Kome Ajise  
January 12, 2024  
Page 3

## **ATTACHMENT A: COMMENTS**

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

Mr. Kome Ajise  
January 12, 2024  
Page 4

## Caltrans Headquarters

### HQ Office of Regional Planning and HQ Air Quality Branch

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

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

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

#### **Consultation and Cooperation:**

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

#### **Modal:**

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

#### **Financial:**

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 5

### Transportation Conformity Analysis:

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

### 2023 FSTIP Finding:

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

## HQ Office of Rail Planning and Implementation

### Comments on Draft Connect SoCal 2024

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 6

2. Pg35/Climate Action - Connection to Climate Action Plan for Transportation Infrastructure (CAPTI) is relevant. Recommend addressing how the RTP aligns with CAPTI guiding principles throughout document as appropriate. Link: <https://calsta.ca.gov/subject-areas/climate-action-plan>
3. Pg46/Funding the System - Consider expanding on what innovative and strategic options may be needed (not just the need for new funding); consider exploring specific strategies for leveraging federal funds as well.
4. Pg62/Collaboration and Policy - Consider including reference to include crucial to supporting State goals.
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.
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.).
7. Pg88 - Consider identifying how specific policy's and/or strategies align with State objectives/planning documents.
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.
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.
10. Pg91/Focusing on System Efficiency - Recommend inclusion of multi-modal service integration (not just integrated pricing strategies or seamless trip planning).
11. Pg101 - Consider discussion of complete streets and access to transit with the TPAs.
12. Pg109/Clean Transportation - This section should address strategic investments for transit and rail, not just passenger vehicles.
13. Pg114 - Consider adding "Collaboration between stakeholders for scheduling and increasing ridership"
14. Pg114/Transit and Multi Modal Integration - Service integration is needed, not just connectivity.
15. Pg114/Transit and Multi Modal Integration - Service integration between modes is also needed (i.e. timing of connections not just connections).
16. Pg152/Funding/Investment Strategies - Suggest including strategies for how to most effectively leverage federal funds.

## **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.

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Mr. Kome Ajise  
 January 12, 2024  
 Page 7

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

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

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

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

## Chapter 2: Our Region Today

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

## Chapter 3: The Plan

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

## Chapter 4: Financial Summary

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

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Mr. Kome Ajise  
 January 12, 2024  
 Page 8

- 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>  
 Also, please indicate and clarify in the Y-axis of the graph if the value is in dollar amount millions or thousands.  
*Suggested Action:* We recommend to include the recent 2022 Caltrans Construction Cost Index in the graph: <https://ppmoe.dot.ca.gov/des/oe/docs/CCI.pdf>

### Comments on Transportation Conformity Analysis Technical Report

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

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Mr. Kome Ajise  
 January 12, 2024  
 Page 9

Electric Vehicle (EV) Infrastructure: Installing and expanding electric vehicle charging infrastructure to encourage the use of electric vehicles and reduce emissions from traditional gasoline-powered vehicles.

**Green Roofs and Cool Pavements:** Incorporating green roofs and cool pavement technologies to mitigate the urban heat island effect and improve air quality in densely populated areas.

### Comments on Congestion Management Technical Report

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

### Comments on Performance Monitoring Technical Report

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

### Comments on Mobility Technical Report

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

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

Mr. Kome Ajise  
January 12, 2024  
Page 10

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

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

### **Comments on Demographics and Growth Forecast Technical Report**

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 11

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

### Comments on Project List Technical Report

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 12

## **Caltrans District 7**

### **District 7 Climate Change Adaptation**

#### **General Comments on Draft Connect SoCal 2024**

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

### **District 7 Multi-Modal System Planning**

#### **Comments on Draft Connect SoCal 2024**

##### **Chapter 1: Executive Summary**

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

##### **Chapter 2: Our Region Today**

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 13

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

### **Chapter 3: The Plan**

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

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

Mr. Kome Ajise  
January 12, 2024  
Page 14

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

#### **Chapter 4: Financial Summary**

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

#### **Supplementals**

- Pg 199 through 222 - Very useful section.

## **District 7 Freight Planning**

### **Comments on Draft Connect SoCal 2024**

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 15

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

### Comments on Aviation Airport Ground Access Technical Report

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



Mr. Kome Ajise  
 January 12, 2024  
 Page 16

### Comments on Goods Movement Technical Report

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 17

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 18

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

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Mr. Kome Ajise  
 January 12, 2024  
 Page 19

parts of the SCAG area to the same degree or is this discussion more applicable to some parts of the SCAG area than others? If it is more applicable to certain parts of the SCAG area, could these areas be identified?

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 20

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 21

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 22

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

## **District 7 Special Projects Office (Transportation Planning)**

### **Comments on Draft Connect SoCal 2024**

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

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 23

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

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

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

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

### **District 7 Division of Program and Project Management**

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



Mr. Kome Ajise  
 January 12, 2024  
 Page 24

## Caltrans District 8

### District 8 Office of System Planning

#### Comments on Connect SoCal 2024

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

### District 8 Office of Regional Planning

#### General Comments on Connect SoCal 2024

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 25

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

### **Project Specific Comments on Connect SoCal 2024**

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

### **District 8 Active Transportation Branch**

#### **Comments on Mobility Technical Report**

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 26

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

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

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 27

### Comments on Equity Analysis Technical Report

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

Mr. Kome Ajise  
January 12, 2024  
Page 28

- 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).

Mr. Kome Ajise  
 January 12, 2024  
 Page 29

## **Caltrans District 11**

### **District 11, Various Offices**

#### **Comments on Project List Technical Report**

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

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

### **District 11 Office of Multi-Modal System Planning**

#### **Comment on Connect SoCal 2024**

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

#### **Comments on Project List Technical Report**

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

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

#### **General Comments**

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

Mr. Kome Ajise  
 January 12, 2024  
 Page 30

## Caltrans District 12

### District 12, Various Offices

#### Comments on Connect SoCal 2024

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

#### General Comments on Connect SoCal 2024

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

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

Mr. Kome Ajise  
January 12, 2024  
Page 31

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

### **Comment on Congestion Management Technical Report**

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

### **Comment on Mobility Technical Report**

- Page 203, Map 4-2 “SCAG Regional Express Lanes Network” - The limit of the “Planned\_DualLane\_Segments\_2” line on I-5 in Orange County should end at SR 91. The thick blue line seems to be going beyond SR 91. Blue points representing “Proposed HOV-HOT” should be added to interchanges at I-5/SR 91, I-5/SR 57, and I-5/SR 55.

### **Comments on Project List Technical Report**

#### **Financially Constrained Projects:**

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



Mr. Kome Ajise  
January 12, 2024  
Page 32

## **ATTACHMENT B: COMMENTS**

### **Program Environmental Impact Report (PEIR)**

Mr. Kome Ajise  
January 12, 2024  
Page 33

## Caltrans District 11

### District 11, Various Offices

#### Comments on Program Environmental Impact Report

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

Mr. Kome Ajise  
January 12, 2024  
Page 34

## **Caltrans District 12**

### **District 12, Various Offices**

#### **Comments on Program Environmental Impact Report**

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

### **District 12, Various Offices**

#### **General Comments on Program Environmental Impact Report**

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

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE  
“Bringing People Together to Improve Our Social and Natural Environment”

January 11, 2024

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

**Re: Connect SoCal 2024**

Dear SCAG,

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.

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.<sup>1</sup> 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.

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.

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

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<sup>1</sup> <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>

## CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

“Bringing People Together to Improve Our Social and Natural Environment”

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.

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.

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.

Sincerely,



Marven E. Norman  
Policy Coordinator

**CCA EJ** is a long-standing community based organization with over 40 years of experience advocating for stronger regulations through strategic campaigns and building a base of community power. Most notably, CCA EJ’s founder Penny Newman won a landmark federal case against Stringfellow Construction which resulted in the ‘Stringfellow Acid Pits’ being declared one of the first Superfund sites in the nation. **CCA EJ** prioritizes community voices as we continue our grassroots efforts to bring lasting environmental justice to the Inland Valley Region.





# Center for Demographic Research

## Sponsors:

California State  
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Governments

Transportation  
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## Contributing Partners:

Orange County  
Local Agency  
Formation  
Commission

Orange County  
Sanitation District

January 11, 2024

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

[update@scag.ca.gov](mailto:update@scag.ca.gov)

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

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

Dear Connect SoCal Team:

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

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

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

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

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

CDR 2024 RTP/SCS/Connect SoCal Comment Letter

1/11/2024

Page 2 of 2

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

Again, we thank you for your time and consideration of the comments above. If you have any questions, please do not hesitate to [REDACTED]

Sincerely,



Deborah S. Diep  
Director, Center for Demographic Research

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





City of Anaheim  
**PLANNING & BUILDING DEPARTMENT**

January 12, 2024

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

**RE: City of Anaheim Comments for Draft Connect SoCal 2024  
RTP/SCS and PEIR**

Mr. Ajise,

The City of Anaheim has completed its review of the Draft Connect SoCal 2024 RTP/SCS, PEIR, and related technical reports.

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.

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.

**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”.

**2. Project List Technical Report Page 476, RTP ID S2120056**

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”.

**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.

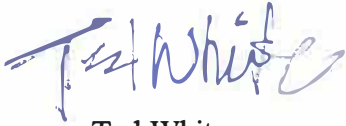


City of Anaheim Comments on Connect SoCal 2024 RTP/SCS and  
PEIR January 12, 2024  
Page 2 of 2

- 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.

Should you have any questions or require additional information, please contact Heather Allen, Deputy Director Planning & Building, at (714) 765-4958 or [hallen@anaheim.net](mailto:hallen@anaheim.net).

Sincerely,



Ted White  
Deputy City Manager /  
Director of Planning & Building



Rudy Emami  
Director of Public Works



# CITY OF EASTVALE

12363 Limonite Avenue | Suite 910 | Eastvale, CA 91752  
951.361.0900

January 12, 2024

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

## **RE: CONNECT SOCIAL 2024 DRAFT**

Dear Connect SoCal Team,

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.

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.

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>.

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.

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](mailto:dmurray@eastvaleca.gov) or (951) 703-4444.

Sincerely,



Mark Orme, ICMA-CM  
City Manager



# CITY OF HUNTINGTON BEACH

## DEPARTMENT OF COMMUNITY DEVELOPMENT

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

January 12, 2024

Connect SoCal 2024

Attn: Ms. Karen Calderon

Southern California Association of Governments, Regional Council

900 Wilshire Blvd., Ste. 1700

Los Angeles, CA 90017

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

### **RE: CITY OF HUNTINGTON BEACH DRAFT CONNECT SOCIAL 2024 AND PEIR COMMENT LETTER**

Dear Ms. Calderon,

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

#### *Priority Development Areas (PDAs)*

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

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

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

### Green Region Resource Area (GRRAs)

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

### Coastal Issues

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

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

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

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

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

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

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

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

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

### Project List

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

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

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

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

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.

### Conclusion

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

Sincerely,



Joanna Cortez  
Senior Planner

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





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

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

Kome Ajise:

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

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

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

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

2. Connect SoCal consistency determinations

The City supports OCCOG's proposed Consistency Language which

Mr. Kome Ajise  
January 11, 2024  
Page 2

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

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

**Insert data usage paragraph:**

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

3. Priority Development Areas (PDAs)

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

Mr. Kome Ajise  
January 11, 2024  
Page 3

#### 4. Growth Forecast

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

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

#### 5. Process Concerns

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

#### 6. Remain Neutral on Technology

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

Mr. Kome Ajise  
January 11, 2024  
Page 4

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

7. Maintain Unbiased, Objective Tone

Language throughout the draft Connect SoCal Plan and PEIR and the associated technical reports and appendices 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.

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

8. “Can and Should”

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

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

9. Duplicative/Existing Regulations

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

Mr. Kome Ajise  
January 11, 2024  
Page 5

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.

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

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

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

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

#### 11. Project List

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

Mr. Kome Ajise  
January 11, 2024  
Page 6

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

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

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

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

Sincerely,



Eric M. Tolles  
Interim Director of Community Development

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

Cc: Oliver Chi, City Manager  
Jeff Melching, City Attorney  
Pete Carmichael, Assistant City Manager  
Jaimee Bourgeois, Director of Public Works and Transportation  
Sean Crumby, Acting Director of Public Works and Transportation  
Kerwin Lau, Deputy Director of Transportation  
Jesse Cardoza, Deputy Director of Community Development  
Marika Poynter, Manager of Planning Services  
Melissa Dugan, Supervising Transportation Analyst  
Alyssa Matheus, Principal Planner  
Justin Equina, Senior Planner  
Marnie Primmer, Executive Director, OCCOG (email)  
Deborah Diep, Director, Center for Demographic Research (email)

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

### Contents

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

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

#	COMMENT TYPE	PAGE REFERENCE	RTP/SCS NARRATIVE, COMMENT & RECOMMENDATION
1.	General Comment	All documents	Include “2024” in all headers for proper citation/reference since the last plan was also called “Connect SoCal”.
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
3.	General Comment	All documents	Connect SoCal is often referred to as “the Plan”. Capitalize “Plan” consistently throughout all documents.
4.	General Comment	All documents	For data that is not derived from Connect SoCal models, cite source.
5.	General Comment	All documents	If definitions come from specific source or statute, include the reference in the narrative and the glossary.
6.	General Comment	All Technical Reports	Add “Technical Report” and “2024” to all technical report page headers’ titles
7.	General Comment	All documents	Note that for any type of growth, the infrastructure capacity needs to be evaluated to determine if additional growth will exceed capacity and would then require infrastructure expansion.

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

Table 2. PEIR COMMENTS

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

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

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
			GHG emissions at the regional level, minus 15% of that regional total level?
5.	General Comment	PEIR	Several Implementation Strategies encourage development along HQTAs. However, many areas that are defined as HQTAs don't actually function as HQTAs. For example, headways take much longer than 15 minutes. What will SCAG do to ensure there is actually high-quality transit systems serving areas of increased development?
6.	General Comment	All maps All documents	All maps in all reports/documents need to be branded with 2024 RTP/SCS/Connect SoCal along with the specific report it is within. Maps are often pulled out as singular items and the maps need to be standalone documents.
7.	General Comment	All pages; tables; figures	Black font on teal background is difficult to read in tables and figures
8.	General Comment	All tables	Consider adding "Note: Numbers may not sum to total due to rounding" to applicable tables and graphics.
9.		ES-4; bullet 3	<p>"Orange County. Orange County covers an area of <del>799948</del> 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"> <li>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.</li> <li>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</li> </ul> <p>Footnote # 2 in ES.4.</p>
10.	Transportation Network	ES-5	<p>The inventory of the bus routes mileage on page ES-5 warrants some clarification.</p> <p>Clarify whether the total miles of bus routes includes or excludes the separately listed bullet of express bus lanes miles. Specifically, is the 2,302 miles of express bus lanes a subset of the 33,485 miles of total bus routes listed, or a separate and additive inventory.</p>
11.	Land Uses	ES-5	<p>Incorrect, interchangeable use of "households" versus "housing units". <u>Please see revised wording below.</u></p> <p>"The SCAG region is comprised of complex patterns of land uses including residential, commercial/office, industrial, institutional, agricultural, and open space land uses. The region has incredible diversity in its built environment and land use patterns (see Map ES-4, Existing Land Use, below). As of 2019, the SCAG region has a total of approximately <del>6.56</del> 6.2 million <u>housing units</u> <del>households</del> in its housing stock, with over half of the <u>housing units</u> <del>households</del> having been built before 1980. While 54 percent are single-family homes, 46 percent are <u>attached multifamily</u></p>

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

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

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

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



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

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

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

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
28.	Mitigation Measures: PMM-AQ-1: Construction Period	ES-29	<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 <u>how many the number of days</u> of the week when construction could occur, or to ask a developer to take a longer amount of time to develop the project? Is this a realistic ask?</p>
29.	Clarification	Table ES-3; ES-30	<p>"PMM-AQ-2 For pProjects subject to California Environmental Quality Act (CEQA) review (i.e., non-exempt projects) and located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and within one-quarter mile (1,320 feet) of a sensitive land use, <u>project leads, as applicable and feasible, should</u><del>shall</del> prepare an air quality analysis that evaluates potential localized project air quality impacts in conformance with SCAQMD methodology for assessing localized significance thresholds (LST) air quality impacts. If air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the project <u>should</u><del>shall</del> incorporate feasible mitigation measures to reduce air pollutant emissions."</p>
30.	Clarification	Table ES-3; ES-30-31	<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), <u>where applicable and feasible.</u>"</p>
31.	Clarification	Table ES-3; ES-32	<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, <u>where applicable and feasible.</u> Such measures may include the following or other comparable measures identified by the lead agency:"</p>
32.	Mitigation Measures: PMM-BIO-3: In-lieu fees vs in kind services	ES-34	<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>
33.	Clarification	Table ES-3; ES-34	<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, <u>where applicable and feasible.</u>"</p>
34.	Clarification	Table ES-3; ES-35	<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</p>

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

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
			and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, <u>where applicable and feasible.</u> "
35.	Mitigation Measures: PMM-BIO-4: Open space/nursery site areas	ES-37	<p>Mitigation Measure PMM-BIO-4(p) identifies that where an RTP/SCS or other regionally significant project has the "potential to impact <b>other open space or nursery site areas</b>," 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>
36.	Mitigation Measures: PMM-BIO-4: Corridor Redundancy	ES-38	<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>
37.	Clarification	Table ES-3; ES-38	"PMM-BIO-5 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, <u>where applicable and feasible.</u> "
38.	Mitigation Measures: PMM-BIO-4: Tree Removal Timing	ES-39	<p>Mitigation Measure PMM-BIO-5(h) identifies that debris to be removed as a result of tree removal work should be done within <b>two weeks</b> of debris creation.</p> <p>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>
39.	Clarification	Table ES-3; ES-40	"PMM-BIO-6 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, <u>where applicable and feasible.</u> "
40.	Clarification	Table ES-3; ES-40	"PMM-CUL-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, <u>where applicable and feasible.</u> "
41.	Clarification	Table ES-3; ES-43	"PMM-CUL-2 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, <u>where applicable and feasible.</u> "
42.	Clarification	Table ES-3; ES-44	"PMM-GEO-1 In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider, <u>where applicable and feasible,</u> mitigation measures

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

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

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

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

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

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

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

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
65.	Clarification	Map ES-7	<ul style="list-style-type: none"> <li>Add page number</li> </ul>
66.	Clarification	p. 1-2; paragraph 3; sentence 6	<p>“...SCAG developed the LDX process to engage local <del>jurisdictions partners</del> and get information needed to fulfill state planning requirements.”</p>
67.	Correction	p. 1-8; paragraph 3; sentence 2	<p>“... Drafting an EIR [...] necessarily involves some degree of forecasting (CEQA Guidelines Section 15144).”</p> <ul style="list-style-type: none"> <li>Insert the missing reference information</li> </ul>
68.	Clarification	p. 1-14; paragraph 2; sentence 1	<p>“In addition, the 2024 PEIR identifies project-level mitigation measures for lead agencies to consider which they “can and should” <u>consider for adoption</u> <del>adopt</del>, as applicable and feasible, in subsequent project-specific design, CEQA review, and decision-making processes.”</p>
69.	Clarification	p. 1-15; paragraph 2; sentence 5	<p>“The <del>notices notice</del> are published in English, Spanish, Korean, Chinese, and Vietnamese languages. The Draft Connect SoCal 2024 <u>documents</u> are posted on the SCAG website and virtually distributed to libraries throughout the region, and physically distributed to libraries upon request.”</p>
70.	Clarification	p. 1-18; Table 1-3	<ul style="list-style-type: none"> <li>Add horizontal lines between rows to make information easier to read</li> </ul>
71.	Clarification	p. 2-6; paragraph 4; last sentence	<p>“Additionally, some local jurisdictions may not be required to complete rezonings associated with housing element updates until October 2024, rendering data on newly available sites inherently incomplete (or unavailable) for the purposes of Connect SoCal 2024.”</p> <ul style="list-style-type: none"> <li>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.</li> </ul>
72.	Clarification	p. 2-7; paragraph 3; last sentence	<p>“As noted above, Connect SoCal 2024 utilized the LDX process to solicit land use and growth input directly from SCAG’s local jurisdictions, and the Plan is the first RTP/SCS prepared by SCAG that did not modify <u>the requested local data inputs of housing and employment.</u>”</p>
73.	Correction	p. 2-8; bullet 3	<p>“Orange County. Orange County covers an area of <del>799948</del> 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"> <li>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.</li> <li>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</li> </ul>
74.	Clarification	p. 2-8; Section 2.4.2; bullet 1	<p>“40 miles of heavy and light rail”</p> <ul style="list-style-type: none"> <li>There are only 40 miles of heavy &amp; light rail in the region?</li> </ul>

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

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
75.	Clarification	p. 2-9; paragraph 1; sentence 4	<p>“While 64 percent are single-family homes, 36 percent are multifamily homes such as condominiums, townhomes, and apartments.”</p> <ul style="list-style-type: none"> <li>• Townhomes are single-family attached homes as defined by the State of California DOF and the U.S. Census Bureau.</li> <li>• 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.”</li> </ul>
76.	Clarification	p. 2-9; paragraph 2; sentence 4-5	<p>“... Much of the open space in the region has been left in its natural state, however many non-native species have transformed what was once native habitat. As of 2018, about half of California has been mapped and classified according to this standard; much of southern California has not yet been classified (CDFW 2023).”</p> <ul style="list-style-type: none"> <li>• Clarify “this standard”</li> </ul>
77.	Clarification	p. 2-9; paragraph 3;	<p>“More than 20 million acres of open space within the SCAG region is currently <del>conserved</del> <del>protected</del> 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"> <li>• Please cite sources of data and clarify numbers and language; is this additive or exclusive?</li> </ul>
78.	Clarification	p. 2-12; footnote; sentence 4	<p>“SCAG used its best efforts to incorporate the RHNA, but the data is inherently incomplete because only 12 of 197 jurisdictions had certified housing elements, and some local jurisdictions may not be required to complete rezoning associated with housing elements until October 2024.”</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>
79.	Clarification	p. 2-13; paragraph 2; sentence 1	<p>“SCAG has the opportunity to analyze and address the inequities that the <u>public</u>, <u>government</u>, and planning profession have created by systemically driving and perpetuating societal differences along racial lines.”</p> <ul style="list-style-type: none"> <li>• Planners and government are not the only parties responsible</li> </ul>
80.	Clarification	p. 2-13; paragraph 3; last sentence	<p>“This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces and conserve the region’s resource areas.”</p> <ul style="list-style-type: none"> <li>• Clarify “if fully realized”</li> </ul>
81.	Clarification	p. 2-13; bullet 1; sentence 2	<p>“Transit Priority Areas (TPAs). ...Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands.”</p>



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

#	COMMENT TYPE	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
			<del>encouraging</del> new residential and commercial development within more rural or suburban settings <del>where such growth may not have been planned.</del>
175.	Section 4.5: Comparison of Alternatives: Alternative 1: Transportation	4-29	<p>This section of the Alternative 1 analysis states that under the Alternative 1: No Build/No Project scenario, that "impacts related to design hazards for transportation projects would be <b>greater</b>, as fewer transportation projects that meet current design standards would be constructed <b>and the Plan's focus on safety would not be implemented.</b>"</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>
176.	Clarification	All pages; 4-31; Agriculture and Forestry Resources; e.g. 5-3	<p>Pertaining to any discussion on farm land lost or at risk, it should be noted that <b>not all land used for farming is/was permanent farmland</b> 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 "<b>not all land used for farming was permanent farmland</b> 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>
177.	Clarification	4-34;	"This alternative would result in <del>less</del> <u>fewer</u> impacts related to <del>the</del> <del>wasteful</del> , inefficient, or unnecessary consumption of energy during construction activities and long-term operations."
178.	Clarification	4-40; paragraph 6	"The performance comparison for the <u>alternatives</u> <del>No-Project Alternatives</del> and the Plan is included in the Connected SoCal 2025 Land Use and Community Technical Report."
179.	Terminology	5-3 5-6	<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>
180.	Clarification	5-3	Agriculture and Forestry Resources section discusses land converted to non-agricultural use. Please clarify if the land is zoned for agriculture or being used temporarily with agriculture uses but zoned as another use.

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

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

**Table 3. AVIATION AND AIRPORT GROUND ACCESS TECHNICAL REPORT COMMENTS**

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

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

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

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

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

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

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

**Table 5. DEMOGRAPHICS AND GROWTH FORECAST TECHNICAL REPORT COMMENTS**

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



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

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION		
			boundary, otherwise known as “Spheres of Influence” the growth must be feasible		
10	General Comment	All pages	Consider adding “Note: Numbers may not sum to total due to rounding” to applicable tables and graphics.		
11	Clarification	All pages	<p>Pertaining to any discussion on farm land lost or at risk, it should be noted that <b>not all land used for farming is/was permanent farmland</b> 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 “<b>not all land used for farming was permanent farmland</b> and was not necessarily designated in the zoning code or general plan for farming.”</p> <p>Update any calculations or clarify language regarding land zoned as farmland or existing land used as farmland that was converted or will be converted to another use.</p>		
12	Correction	All pages	References and source citations to the American Community Survey dataset should use the word “estimates” not “sample”, e.g., “Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates” or for PUMS: “Source: U.S. Census Bureau; American Community Survey (ACS), Three-Year Public Use Microdata Sample (PUMS), 2019-2021”		
13	Define	Add Glossary	Add glossary to technical report and define: ACS BLS DPH EDD GRRRA Headship rates	LDX LED NAICS Overcrowding/rates PDA People of color PopSyn	PUMS QWI racial/ethnic groups Sketch-planning sustainability p. 28 SWAA WFH
14	Clarification	p. 5; paragraph 5; sentence 2	“Long-range growth in an entire region, or within individual neighborhoods, cannot be <u>specifically</u> predicted; however, probabilistically it is usually more likely to be nearer to the middle of a range than to the extremes.”		
15	Clarification	p. 7; paragraph 2; sentence 1	“Between March and November 2022, SCAG staff <del>initiated and</del> completed one-on-one meetings with 164 of the region’s 197 local jurisdictions to explain the methods and assumptions behind the preliminary small-area growth forecast, as well as to provide an opportunity to review, edit and approve <del>data the provided maps as well as</del> and provide jurisdiction and TAZ totals for households and employment in 2019, 2035, and 2050.”		

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

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

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

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none"> <li>Change title “Figure 6. New Housing Units <u>Permitted</u> and Average Household Size, SCAG Region, 2000-2022”</li> <li>Change source “Source: <del>CA DOF E-5 and</del> <u>Permits: Construction Industry Research Board New Units from Permits. Household Size: CA DOF E-5 January 1 Estimates.</u> *2019 household size uses SCAG Growth Forecast in lieu of DOF to benchmark to Census 2020.</li> </ul>
31	Clarification	p. 16; table 5	Define “headship by age”.
32	Clarification	p. 16; paragraph 2; last sentence	“Due to aging alone, the number of households would be expected to increase by more than 26 percent, compared with 11 percent population <u>overall growth.</u> ”
33	Clarification	p. 16; paragraph 4	“Household sizes tend to increase in the years following low housing production. Housing production was especially low over 2008-2013 as a result of the Great Recession—household sizes plateaued at around 3.1 and began to decline <del>precipitously</del> thereafter. This is related to the population growth slowdown coupled with relatively robust housing production, in addition to new Census 2020 data indicating more housing units in the region than were previously known to exist— <u>likely due to better canvassing of neighborhoods and identification of new or non-permitted structures and conversions.</u> ”
34	Clarification	p. 16; paragraph 6; sentence 2  sentence 3	<p>“The 53,745 new units <u>permitted</u> in the region in 2022 reflect a higher number of new units than at any single year since 2006. <u>The higher number of units permitted is due in part to the increased in These data likely undercount</u> accessory dwelling unit (ADU) production. <u>A</u>—a newly available data series from the Department of Housing and Community Development show a rapid rise <u>of ADUs</u> in the region in recent years and over 11,000 ADUs in 2021. <u>This suggests that total new unit construction in recent years is likely even higher than shown in Figure 6.</u>”</p> <ul style="list-style-type: none"> <li>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.</li> <li>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?</li> <li>Is CIRB is questioning whether jurisdictions are reporting permits for new ADUs and permits for legalizing non-permitted ADUs?</li> </ul>
35	Correction	p. 18; Figure 8; paragraph 1 sentence 2	<p>“Between 2016 and 2019, employment was growing and the P:E ratio declined (Figure <del>78-B</del>).”</p> <p>Recommend relabeling Figure 8 to Figure 8-A and Figure 8-B.</p>
36	Correction	p. 20; paragraph 1	“Since 2000, SCAG <del>region</del> <u>regional</u> employment in the following four sectors...”
37	Correction	p. 21; paragraph 2	“In constant 2022 dollars, the median wage in the SCAG region was \$23.23 in 2002, \$22.88 in 2012, and \$22.87 in 2022. Table <del>87</del> summarizes the wage ranges for each category.”
38	Clarification	p. 22; paragraph 1	<p>“Although the region’s economy recovered quickly from the COVID recession, ...</p> <ul style="list-style-type: none"> <li>Please clarify how recovery is defined--# of jobs? # of businesses? Unemployment rate? Many businesses closed permanently.</li> </ul>

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

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

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

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

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

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

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

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

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

Table 6. ECONOMIC IMPACT ANALYSIS TECHNICAL REPORT COMMENTS

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



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

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
11	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”
12	General Comment	All pages	Add “2024 Technical Report” to the header of each page
13	Clarification	p. 2; paragraph 2	“In 2023, the economic impacts of Connect SoCal 2024 on the <u>SCAG-region</u> <del>SCAG-region</del> economy are at least as important, if not more. The SCAG region is in a similar situation recovering from the economic shock of the <u>response to the</u> COVID-19 pandemic, which upended nearly every aspect of the regional (and global) economy. COVID-19 had unprecedented impacts on the labor market. For example, pandemic-induced workplace closures drastically changed commuting patterns and employment locations. The pandemic <u>response</u> accelerated the decades-long increasing trend of remote and hybrid work, and because of pandemic-induced technological and cultural change, is likely to persist into the foreseeable future (Barrero, Bloom, and David 2023).”
14	Clarification	p. 2; paragraph 3; sentence 2	“The SCAG region has proven resilient in its recovery from the short but sharp COVID-19 recession. Connect SoCal 2024 investments, policies, and strategies strive to be more than the sum of their parts and capture synergies for the Plan. The intent is to fulfill the Plan’s vision of a healthy, prosperous, accessible, and connected region for a more resilient and equitable future <sup>i</sup> . Connect SoCal 2024 adds important emerging priorities for the region: a plan that fosters regional resilience, equitable and inclusive economic growth for all <u>SCAG-region</u> <del>SCAG-region</del> residents.” <ul style="list-style-type: none"> <li>• Use footnotes instead of the single endnote in the document</li> </ul>
15	Correction	p. 2; paragraph 5; sentence 2	“Connect SoCal 2024 details <u>SCAG-region</u> <del>SCAG-region</del> transportation spending exceeding \$413 billion...”
16	Clarification	p. 3; paragraph 2	“Achieving the Plan’s promise of economic growth requires us to recognize that the region faces significant income inequality. For example, in 2021, in the SCAG region, <ul style="list-style-type: none"> <li>• Hispanic workers earned 56 percent of White worker wages,</li> <li>• Black workers earned 72 percent of White worker wages, and</li> <li>• Women earned 81 percent of men’s wages. (American Community Survey, 2021)” <ul style="list-style-type: none"> <li>• Is this using median or average wages?</li> <li>• Are the comparisons controlled for years or experience, education or any other factors?</li> </ul> </li> </ul>
17	Clarification	p. 3; second set of bullet points	“9.7 percent of the region’s households lived in overcrowded housing compared to 7.0 percent for the rest of California and 3.4 percent for the U.S., and <ul style="list-style-type: none"> <li>• Housing costs overburdened 45 percent of the region’s households” <ul style="list-style-type: none"> <li>• Please define ‘overcrowded’ and include source</li> <li>• Please define ‘overburdened’ and include source</li> </ul> </li> </ul>
18	Clarification	p. 5; paragraph 4; sentences 1-2	“A mix of transportation projects <u>is</u> planned in the six SCAG counties over the 26-year model timeframe. Of the total Connect SoCal 2024 expenditures exceeding \$413 billion (constant 2023 dollars).”

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

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

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

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

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

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

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

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

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

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

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

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

**Table 8. GOODS MOVEMENT TECHNICAL REPORT COMMENTS**

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

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

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

**Table 9. HOUSING TECHNICAL REPORT COMMENTS**

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

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

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



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

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

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

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

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

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			Figure 1. SCAG <del>Counties</del> <u>Counties</u> 2021 Housing Stock”
31	Clarification	p. 7; paragraph 1; sentence 2  4.1 Housing Stock Housing Built before 1990	<p>Page 7, first paragraph, makes an argument that living in a home built before 1990, "when combined with other conditions such as substandard facilities, cost burden, overcrowding and housing <u>under</u>production ... results in a scenario where the region is not meeting the housing needs of who is already here in the region."</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• And further, how the age of a housing structure "results in a scenario of disproportionate burden and inequity."</li> <li>• 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.</li> </ul>
32	Clarification	p. 7; paragraph 2; sentence 3	“In every county <u>in the SCAG region</u> , there are more homeowners than renters, except for Los Angeles County which has a 55 percent renter-occupied housing rate. However, a look at housing tenure among communities of color reveals an inequitable distribution of homeownership.”
33	Clarification	p. 7; paragraph 3; sentence 3	<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: “According to SCAG’s 2022 Racial Equity Baseline Conditions Report, 61 percent of <u>non-Hispanic</u> White households owned their home compared to only 58 percent of <u>non-Hispanic</u> Asian/Pacific Islander households, 44 percent of Hispanic (<u>or</u> Latino) households, 36 percent of <u>non-Hispanic</u> Black households, and 47 percent of <u>non-Hispanic</u> Native American households. This means that <u>non-Hispanic</u> White household homeownership is nearly twice the rate of <u>non-Hispanic</u> Black households.”</p>
34	Clarification	p. 9 Figure 5  4.2 Housing Tenure By Race & Ethnicity	<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"> <li>• Please specify whether the racial/ethnic categories are all for non-Hispanic groups other than <u>Hispanic (or Latino)</u>; if so, add “non-Hispanic” to categories other than Hispanic/Latino.</li> </ul>
35	Clarification	p. 10	This section, first paragraph, states that "there are still 80,909 units lacking complete kitchen facilities and 22,282 units lacking complete plumbing facilities in the SCAG region."

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

**Table 10. LAND USE AND COMMUNITIES TECHNICAL REPORT COMMENTS**

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

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

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

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

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

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

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

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

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			growth. <u>However, for these additional units to be realized, oftentimes the existing structures would have to be demolished and replaced with higher density developments.</u> Using this capacity as a starting point, the Regional Growth Vision:"
34	Clarification	p. 23; bullet 3; sentence 4	"Edits received on growth are often reflective of local general plans, local growth policies, <u>entitled and approved projects</u> , historic preservation, anticipated job growth, amongst several other factors."
35	Clarification	p. 28; second bullet	" <del>Implement</del> <u>Promote</u> the Forecasted Regional Development Pattern of Connect SoCal 2024, consisting of household and employment projections that have been reviewed and refined by jurisdictions and stakeholders to advance this shared framework for regional growth management planning..."
36	Clarification	p. 29; paragraph 3	"This data was mapped and functioned as a key informational resource during local review along with the PDAs. As a result of this process, growth in overlapping GRRAs has been de-emphasized but not completely <u>eliminated in eliminated</u> . <del>in the Connect SoCal 2024 forecasted development pattern.</del> <u>pattern.</u> "
37	Clarification	p. 29; paragraph 5; sentences 3-4	"CoSMoS is an online mapping viewer that makes detailed predictions over large geographic scales of storm-induced coastal flooding and erosion for both current sea level rise (SLR) scenarios. The data included in this <u>technical report book</u> depicts the potential inundation of coastal areas resulting" <ul style="list-style-type: none"> <li>• What are the "both" scenarios?</li> </ul>
38	Clarification	p. 34; paragraph 3; sentence 2	"Local jurisdictions were then engaged for review and feedback that was then <u>incorporated</u> <del>integrated</del> to best reflect local plans and conditions."
39	Clarification	p. 35; Map 6	Explain what is being shown or add a note referring the reader to the specific section that explains the map
40	Correction	p. 36; paragraph 1; sentence 4	"132 local jurisdictions provided input on SCAG's draft growth forecast, while 148 percent provided input on other data elements such as GIS maps or surveys." <ul style="list-style-type: none"> <li>• Correct the 148 percent</li> </ul>
41	Clarification	p. 37;	"Data- For the one question assessing data collected by local jurisdictions, the most common are: Local road pavement management and performance data (52 jurisdictions), Collision data (51 jurisdictions) and Pavement Condition Index (49 jurisdictions)." <ul style="list-style-type: none"> <li>• Please clarify</li> </ul>
42	Clarification	p. 37; paragraph 1	"To ensure that the local edits to the development pattern appeared on-track to reach SCS objectives, SCAG conducted a sketch-planning evaluation with the assistance of the Technical Working Group (TWG), <u>which this occurred prior to development of subsequent Connect SoCal 2024 strategies and modeling<sup>26</sup>.</u> <del>modeling<sup>26</sup></del> According to this evaluation, the FRDP has slightly less growth in the most prioritized areas ( <u>steps 1-3 representing areas with more than one PDA and no GRRAs</u> ) than the preliminary projection ( <del>steps 1-3 representing areas with more than one PDA and no GRRAs</del> ); however, its performance exceeded that of the final, adopted Connect SoCal 2020. Similarly, the share of growth in <u>areas with no more than one GRRRA</u> increased from 88 percent to 90 percent compared to the prior plan (Figure 1)."



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

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

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

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

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

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

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

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

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

#	COMMENT TYPE	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<ul style="list-style-type: none"> <li>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.</li> </ul>

**Table 11. MOBILITY TECHNICAL REPORT COMMENTS**

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

**Table 16. TRANSPORTATION FINANCE TECHNICAL REPORT COMMENTS**

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

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

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

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

#	COMMENT TYPE	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			disclosure, and an important element of the financial plan that relieves the burden on limited federal, state and local transportation funding.
12	Clarification	p. 11 & 12; Figure 8  3.1: Core Revenues Federal	The narrative on Federal sources of core revenues on page 11 states that FTA Formula and Discretionary funds cumulatively account for 61% of the federal funding for the SCAG region. Please confirm. In reviewing the referenced Figure 8, the sum of the two funds appears to be 58%.
13	Clarification	p. 12, 13 Tables 2-4 Table 3.4  3.2: New Reasonably Available Revenues: Mileage-Based User Fee (Replacement) vs Local Road Charge Program	<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.</p> <p>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>
14	Clarification	P. 14-15, Table 2	While the number is available later in the report, Table 2 should include the total sum of new reasonably available revenue.
15	Clarification	p. 26 4. Expenditures	<p>a) Page 26 of this section references a <b>Figure 11</b> 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 <b>Figure 12</b> 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>
16	Clarification	P. 28, Table 5 P. 31, Table 6  Expenditure	Both Table 5 and Table 6 refer to service expansion. Recommend adding language that differentiates what is included in each table. For example, specify infrastructure and equipment required for service expansion in Table 5. Also clarify if operating costs are included in Table 6 as the text description before it only suggests system preservation and maintenance needs.
17	Correction	p. 29	Table 5, Highways, Add toll roads to HOV/Express Lanes/ <b>Toll Roads</b> . This change should also be made elsewhere in the main RTP/SCS document where highways and express lanes are discussed.  Revise Description to include auxiliary lanes, general purpose lanes, carpool lanes, toll roads, toll lanes, and Express/HOT lanes.
18	Clarification	p. 30, 31	This section, second paragraph, outlines different factors that impact/damage roadways. One issue that has surfaced at SCAG policy

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

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


**TABLE 17. TRAVEL AND TOURISM TECHNICAL REPORT COMMENTS**

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

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

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

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

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



## CITY OF MURRIETA

January 12, 2024

Delivered Electronically

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

Re: Draft Connect SoCal Plan Comments - City of Murrieta Comments and Objections to Connect SoCal

The City of Murrieta appreciates the opportunity to review and comment on the draft Connect SoCal 2024 plan (Draft Plan). The City's comments are focused on land use assumptions and household growth projections.

### **Proposed Livable Corridor within Murrieta**

The Draft Plan includes what SCAG terms as a "Livable Corridor" generally running 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 inappropriate 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.



City of Murrieta

Connect SoCal Comments

January 12, 2024

These are not merely topics under CEQA that can be overridden through the adoption of findings, these issues speak to public health, safety and welfare, environmental justice, and the basics of land use planning that directly address the carrying capacity of land. Higher intensity land uses must not be planned on land exposed to significant environmental hazards, which the City has recognized for this area since its incorporation. A SCAG proposal to forecast growth in such an area is unwelcome.

### Household Growth

The Draft Plan's anticipated household growth ignores the City'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, or 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>.

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.

### Conclusion

The City appreciates SCAG's consideration of these comments and requests that SCAG reconsider the Household Growth for the Draft Plan which includes the elimination of the proposed Livable Corridor with the City of Murrieta for the reasons described above. In support of the City's request please find attached pages 12-36 through 12-42 of the City's Safety Element depicting areas at risk of subsidence, Alquist-Priolo fault zones, fault maps, liquefaction, flood zones, dam inundation and high fire hazard severity zones.

Sincerely,



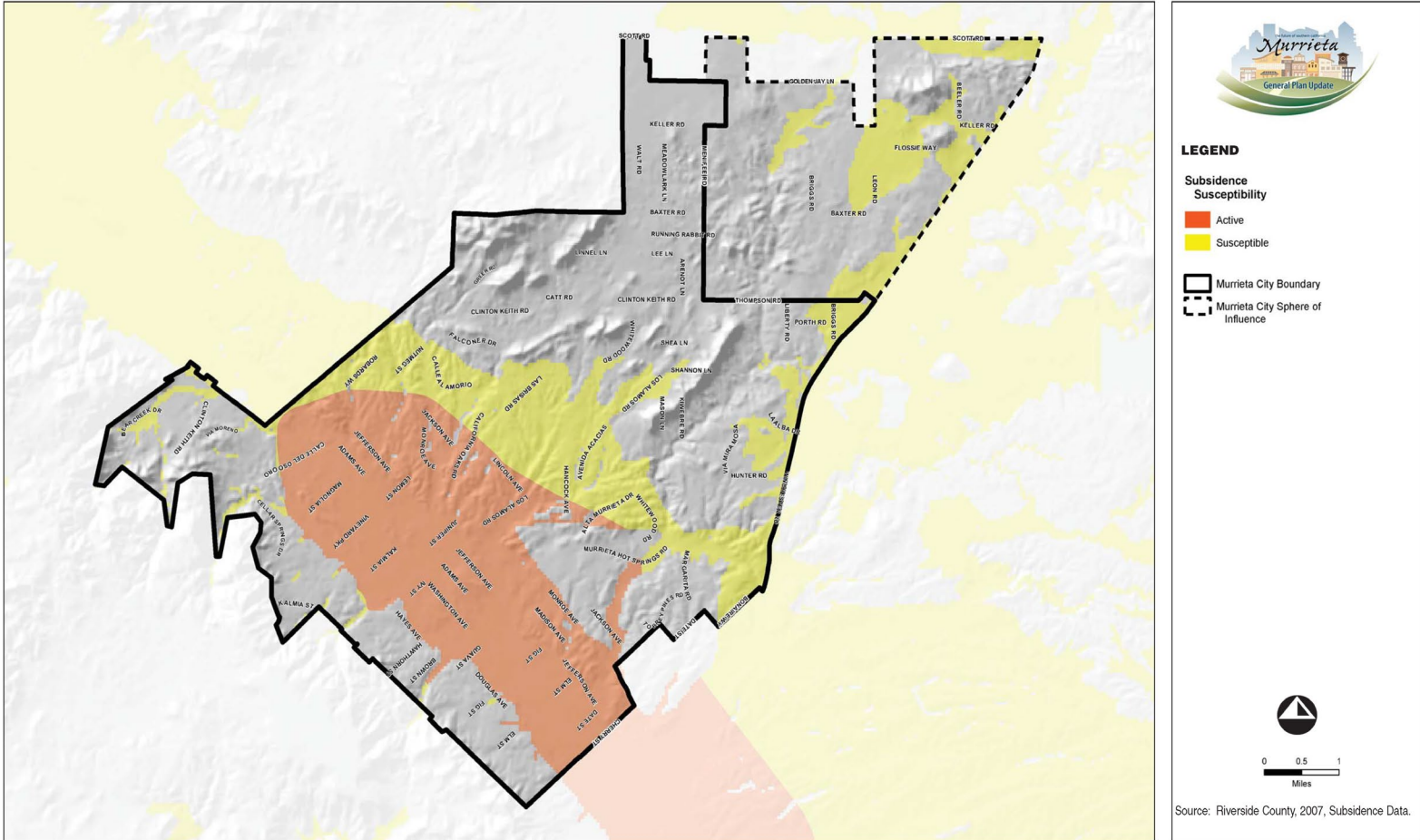
David Chantarangsu, AICP  
Development Services Director  
City of Murrieta

Attachments: Murrieta Safety Element Pages 12-36 through 12-42 and 2017 LA Times Article (Uploaded to Submission Form Webpage)

# Safety Element

# Chapter 12

### Exhibit 12-2, Subsidence Susceptibility Map



0711-JN 10-10/076

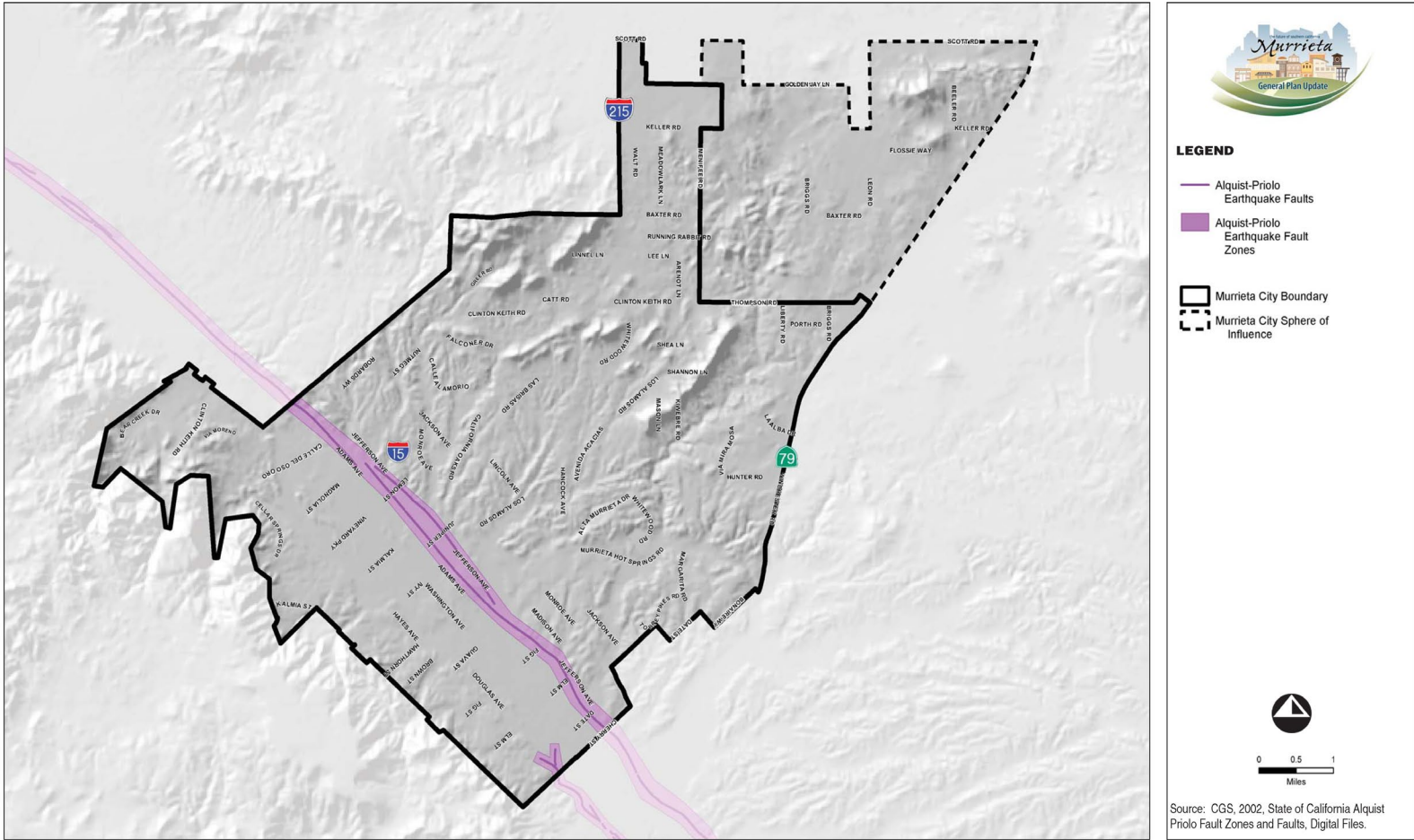
### Subsidence Susceptibility Map

Exhibit 12-2



# Chapter 12 Safety Element

## Exhibit 12-3, Alquist-Priolo Earthquake Fault Zone Map



- LEGEND**
- Alquist-Priolo Earthquake Faults
  - Alquist-Priolo Earthquake Fault Zones
  - Murrieta City Boundary
  - Murrieta City Sphere of Influence



Source: CGS, 2002, State of California Alquist Priolo Fault Zones and Faults, Digital Files.



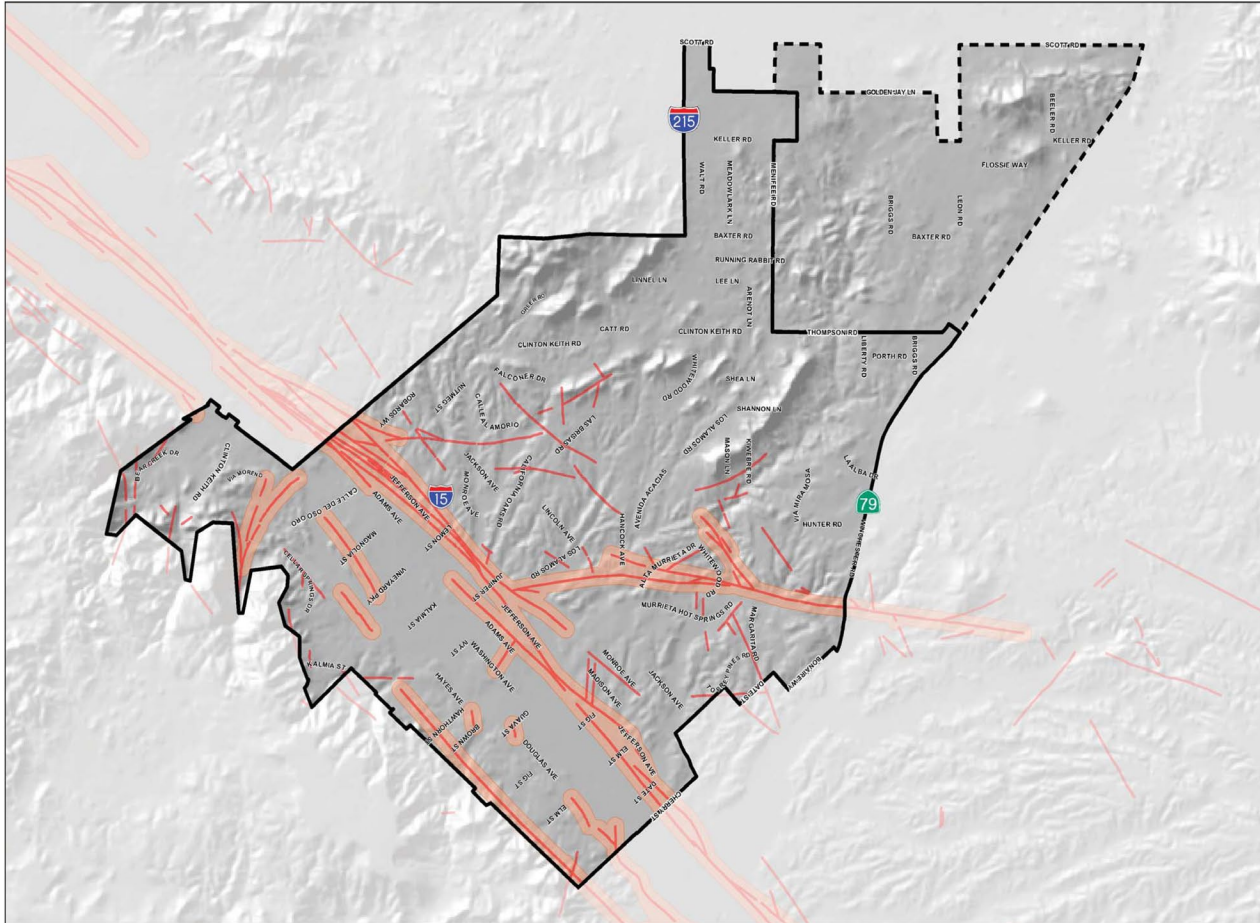
**Alquist-Priolo Earthquake Fault Zone Map**  
Exhibit 12-3



# Safety Element

# Chapter 12

### Exhibit 12-4, Riverside County Fault Hazard Map



- LEGEND**
- Riverside County Earthquake Faults
  - Riverside County Earthquake Fault Zones
  - Murrieta City Boundary
  - Murrieta City Sphere of Influence



Source: Riverside County Earthquake Fault Zones and Faults, Digital Files.



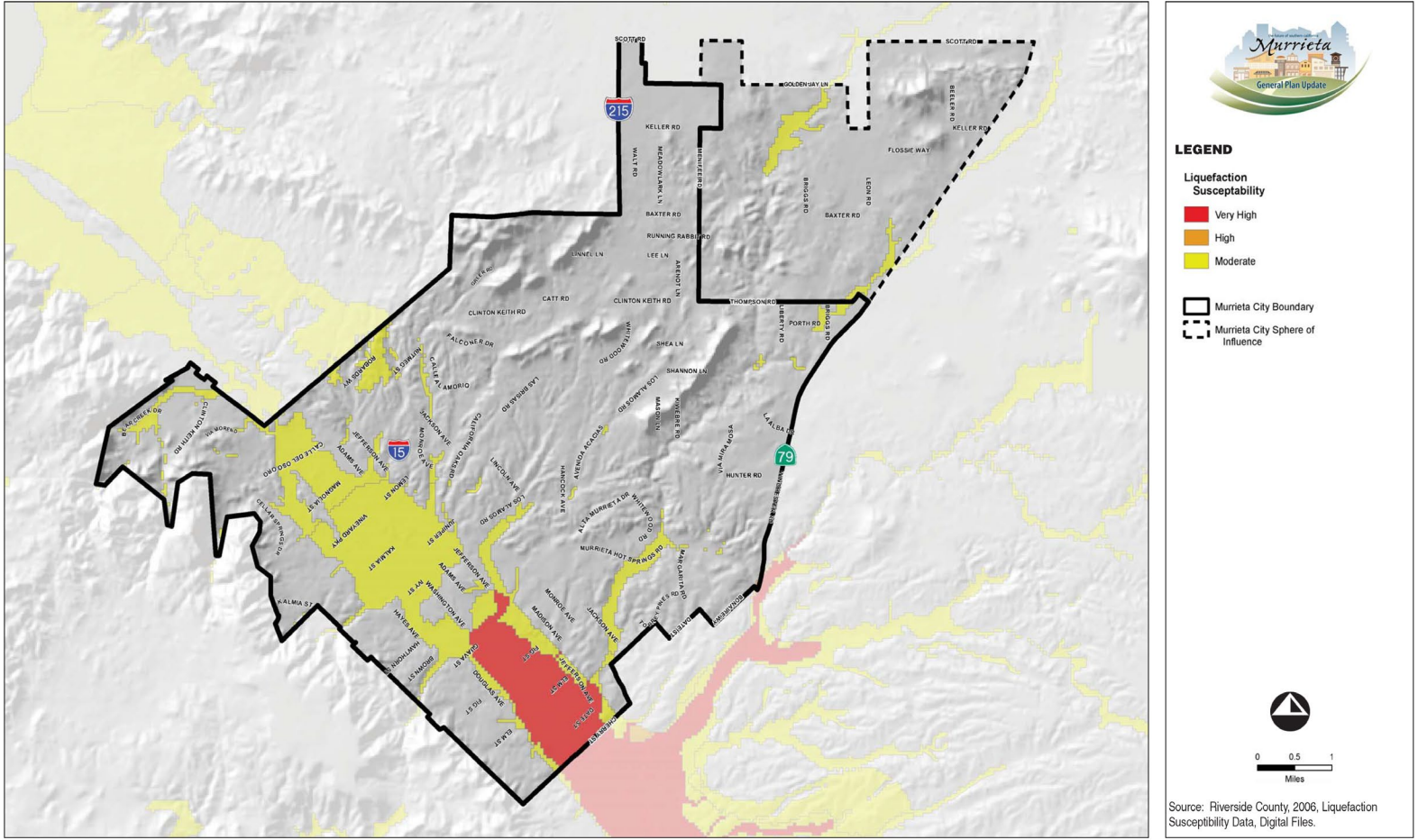
0711 • 2/15/10-108076





# Chapter 12 Safety Element

## Exhibit 12-5, Liquefaction Susceptibility Map



0211-28 10-10670

### Liquefaction Susceptibility Map

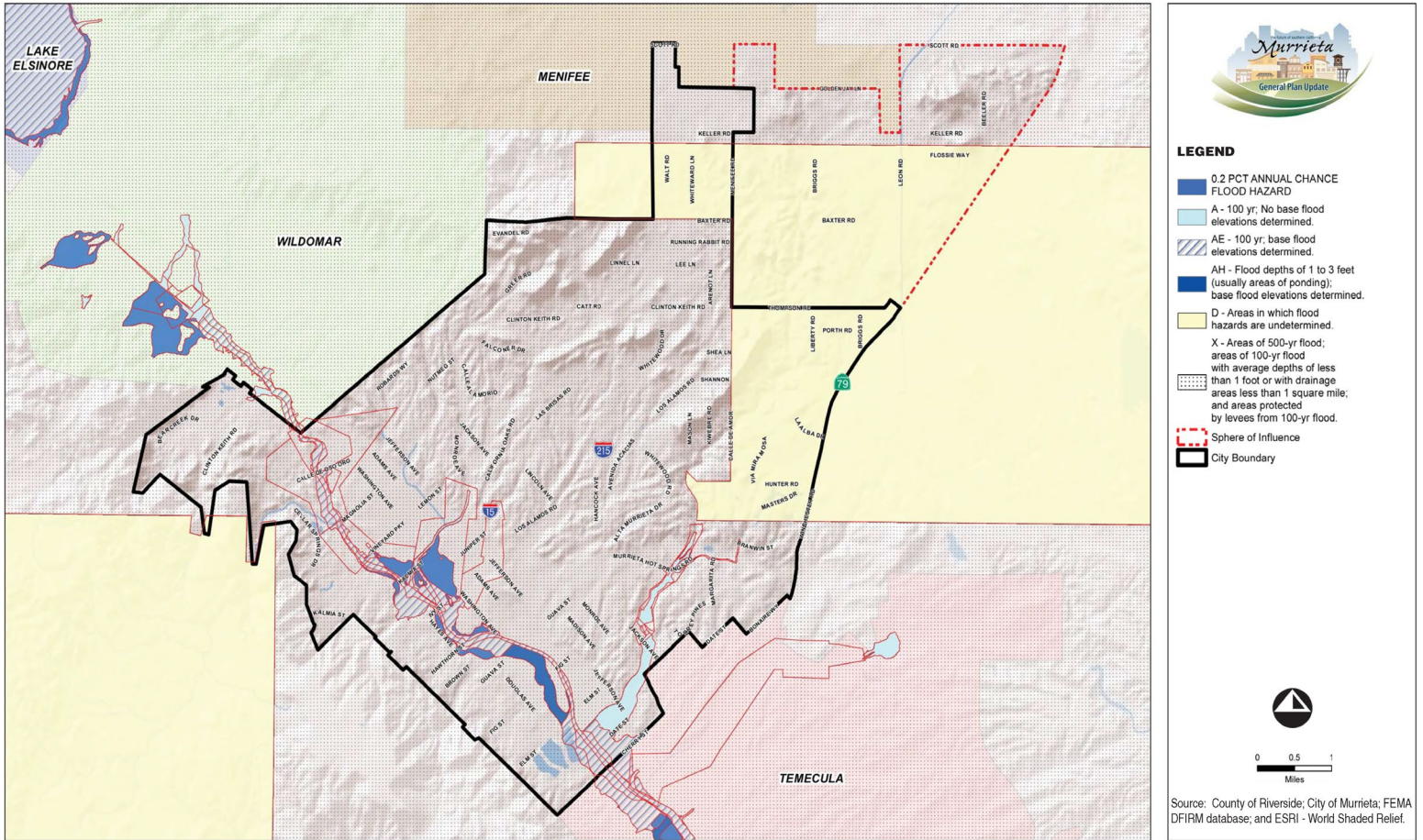
Exhibit 12-5



# Safety Element

# Chapter 12

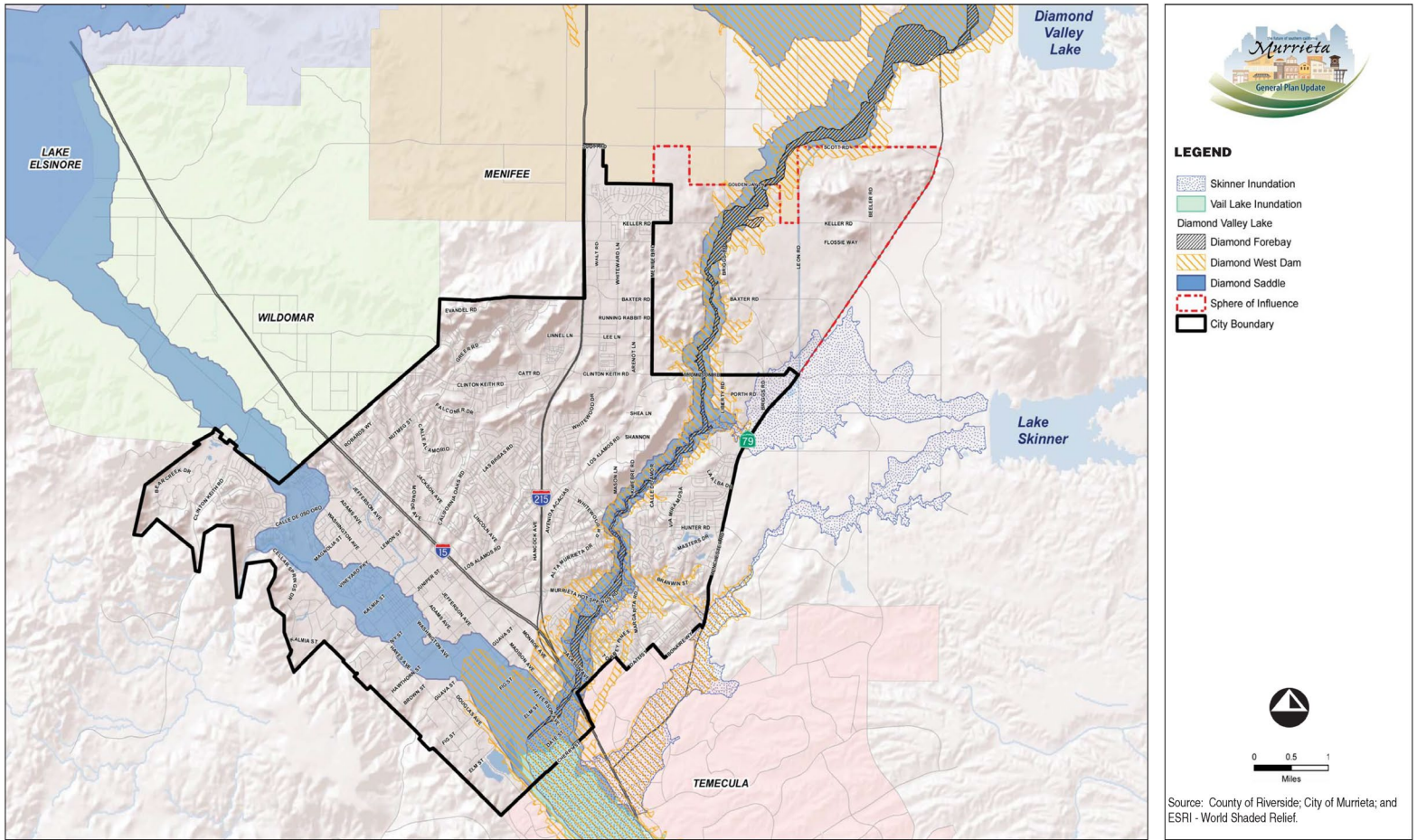
Exhibit 12-6, FEMA Flood Zones





# Chapter 12 Safety Element

## Exhibit 12-7, Dam Inundation



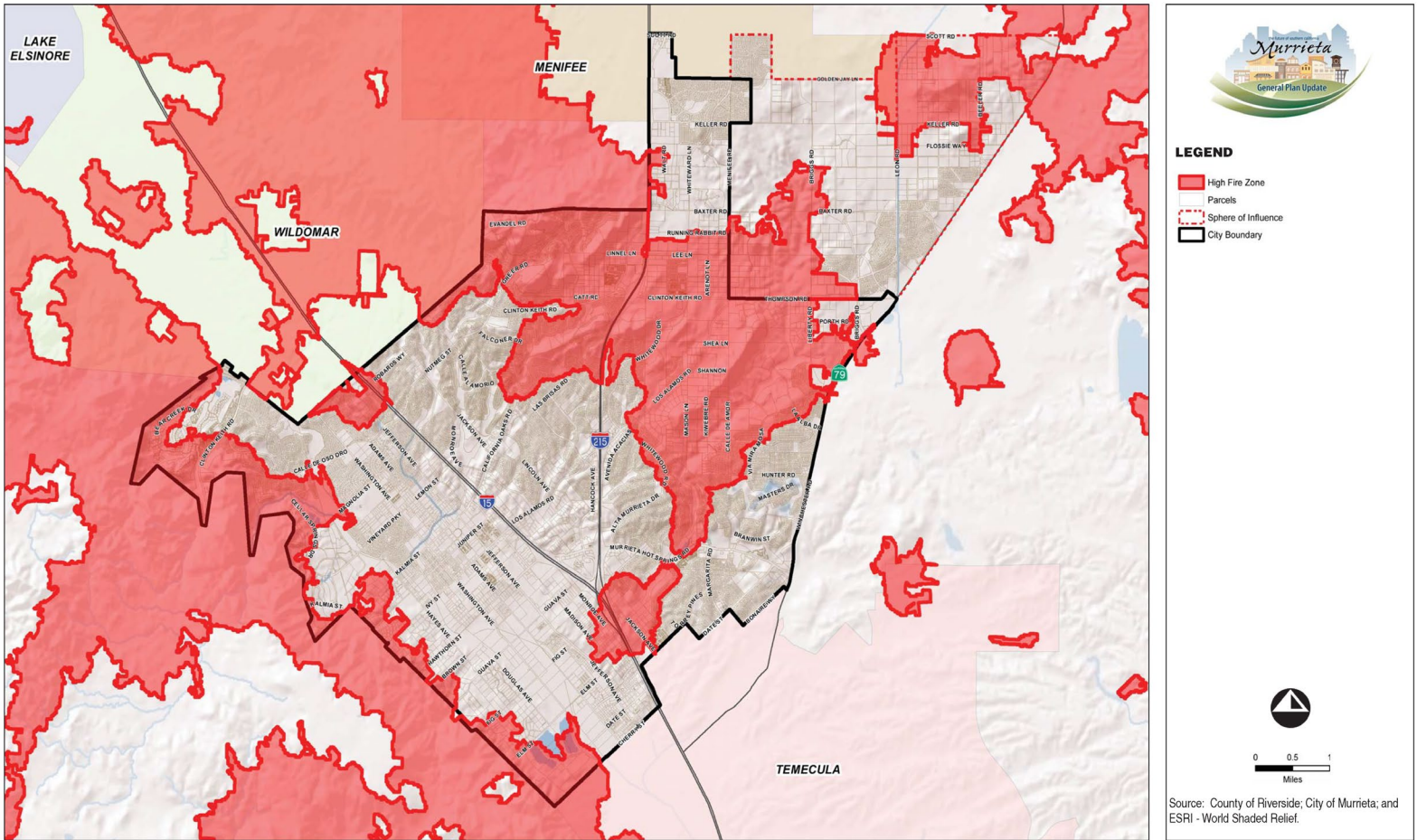
Source: County of Riverside; City of Murrieta; and ESRI - World Shaded Relief.



# Safety Element

# Chapter 12

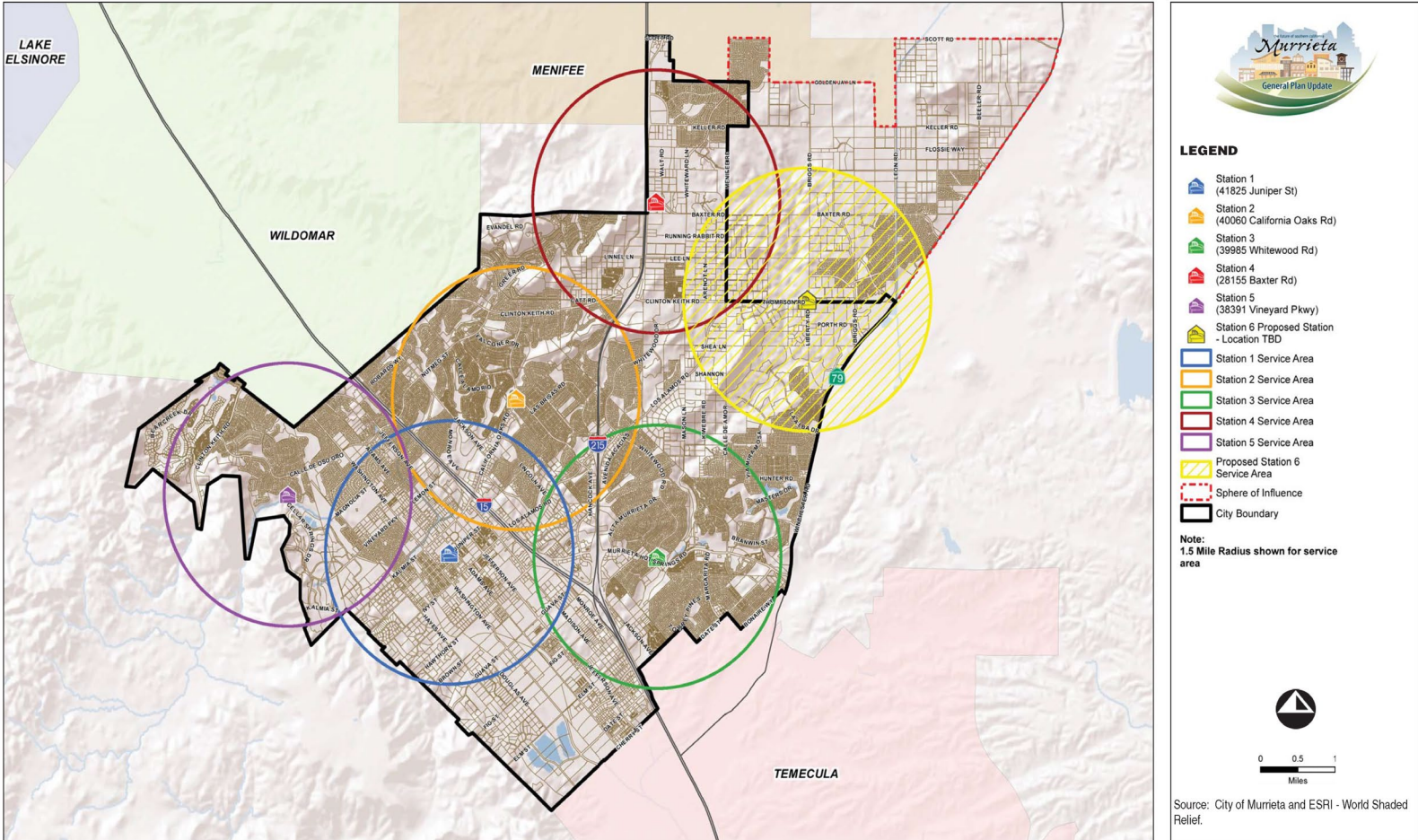
### Exhibit 12-8, Very High Fire Hazard Zones





# Chapter 12 Safety Element

Exhibit 12-9, Fire Station Service Areas



**LEGEND**

- Station 1 (41825 Juniper St)
- Station 2 (40060 California Oaks Rd)
- Station 3 (39985 Whitewood Rd)
- Station 4 (28155 Baxter Rd)
- Station 5 (38391 Vineyard Pkwy)
- Station 6 Proposed Station - Location TBD
- Station 1 Service Area
- Station 2 Service Area
- Station 3 Service Area
- Station 4 Service Area
- Station 5 Service Area
- Station 6 Service Area
- Sphere of Influence
- City Boundary

**Note:**  
1.5 Mile Radius shown for service area

Source: City of Murrieta and ESRI - World Shaded Relief.





# Safety Element

# Chapter 12

### Exhibit 12-10, Recent and Historic Fires

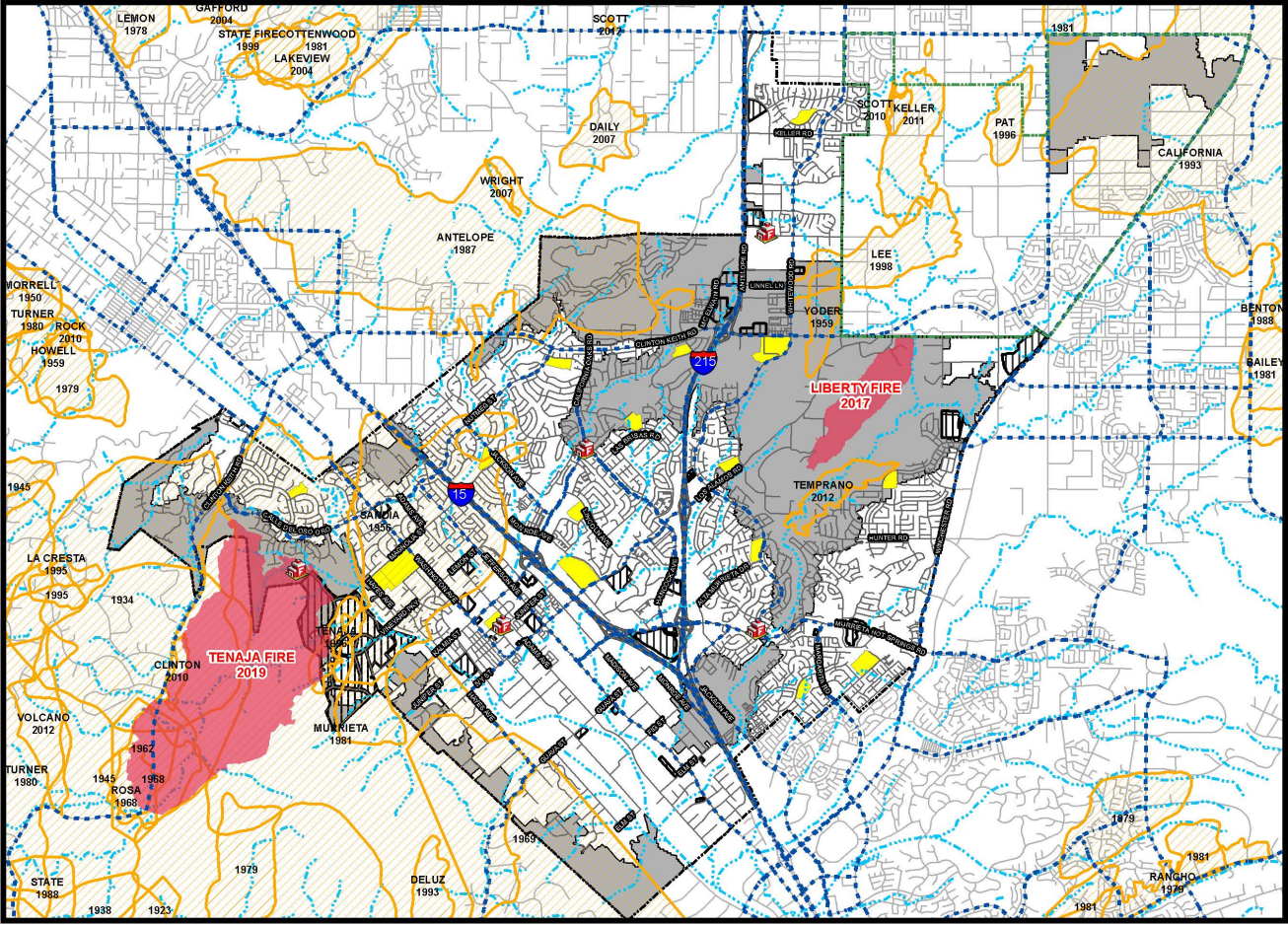


**Legend**

- City of Murrieta Fire Stations
- City's Sphere of Influence
- Evacuation Routes - WRCOG
- Recent Fires within City
- Historic Fires - CAL FIRE Version 19-1
- Municipal Boundary
- CDFW Stream Data - WRCOG
- Surrounding Streets
- City Streets
- School Campus Locations
- Development Activity as of 2020
- Very High Fire Zones within City & Sphere

This map is a public resource of general information. The City of Murrieta makes no warranty, representation or guarantee as to the content, accuracy, or completeness of the map information provided herein. City of Murrieta is not responsible for any claims, losses or damages resulting from the use of this map.

Sources: CAL FIRE, WRCOG, Riverside County, City of Murrieta



**CITY OF MURRIETA  
GENERAL PLAN UPDATE  
FIRE SAFETY ELEMENT**

**Recent and Historic Fires**  
Exhibit 12-10





CALIFORNIA

# California officials say housing next to freeways is a health risk — but they fund it anyway



Traffic flows on the I-5 near the Sheldon Street exit where an empty lot is a possible site for a homeless veterans housing complex in Sun Valley on December 12, 2017. (Genaro Molina / Los Angeles Times)

BY TONY BARBOZA, DAVID ZAHNISER

DEC. 17, 2017 5 AM PT





Low-cost senior housing is set to go up along the Sheldon Street offramp of the 5 Freeway in Sun Valley. (Genaro Molina / Los Angeles Times) (Genaro Molina / Los Angeles Times)

It's the type of project Los Angeles desperately needs in a housing crisis: low-cost apartments for seniors, all of them veterans, many of them homeless.

There's just one downside. Wedged next to an offramp, the four-story building will stand 200 feet from the 5 Freeway.

State officials have for years warned against building homes within 500 feet of freeways, where people suffer higher rates of asthma, heart disease, cancer and other health problems linked to car and truck pollution. Yet they're helping build the 96-unit complex, providing \$11.1 million in climate change funds from California's cap-and-trade program.

The Sun Valley Senior Veterans Apartments is one of at least 10 affordable housing projects within 500 feet of a freeway awarded a total of \$65 million in cap-and-trade money since 2015, a Times review of records found. Those developments will place hundreds of apartments for homeless people, veterans and families near freeways in Los Angeles, the Bay Area and the Central Valley, some less than 100 feet from traffic.

California's support for those projects shows how policies created to cut greenhouse gases and ease the housing crunch are also putting some of the state's neediest residents at risk from traffic pollution. It's one way public dollars are helping finance a surge in residential development near freeways, where Los Angeles and other California cities have permitted thousands of new homes in recent years.

### **How close do you live to the freeway? »**

State officials acknowledge that some cap-and-trade money, collected from companies that buy permits to emit greenhouse gases, will put residents near elevated levels of pollution. But they say dense housing near bus and rail lines is crucial to meeting California's climate goals, by getting cars off the road.

Even in places with poor air quality, they argue, residents' health will improve from walking and biking more. And they say the dangers from living near freeways can be reduced with anti-pollution design features recommended this year by state air regulators, including sound walls, vegetation barriers and high-efficiency air filters that remove some of the harmful particles from vehicle exhaust.

"When those strategies are employed, the environmental and public health benefits of these projects far outweigh the negatives," said Ken Alex, a senior advisor to Gov. Jerry Brown who chairs the Strategic Growth Council, the agency that distributes cap-and-trade funds to affordable housing developers.



Developers of the Sun Valley Senior Veterans Apartments say the project will have features to deal with nearby freeway pollution: a sound wall, dozens of trees and high-efficiency air filters to screen out pollutants. (Genaro Molina / Los Angeles Times)

California's decision to subsidize low-income housing near freeways alarms some health scientists, who point to years of studies that link roadway pollution with a growing list of illnesses — and billions in healthcare costs. They say air filters and other mitigation measures are not enough to protect residents, especially children, whose lungs could be damaged for life, and seniors, who could die early from heart attacks.

“I see the economic incentives for doing this,” said Beate Ritz, an environmental epidemiologist at UCLA who has studied the health effects of traffic pollution for more than two decades. “But it’s kind of stupid, because we all know we will pay for it with long-term health effects. Somebody has to pay for the costs of diabetes, of cognitive decline or strokes. This is just creating a huge amount of costs for society in the long run.”



Construction is expected to start within weeks on the Sun Valley project, capping a decade of debate that pitted the need for more housing against the health of people who would live there. Proponents say those apartments will be far superior to life on the street, with higher-rated air filters and a buffer — dozens of trees, a sound wall and a parking lot — separating residents from pollution.



A plan for a 96-unit affordable housing project in Sun Valley is opposed by a trio of local veterans: Gary Aggas, 70; Garry Fordyce, 70; and Mike O’Gara, 78. All three say the building will put seniors and veterans too close to freeway pollution. (Genaro Molina / Los Angeles Times)

Despite those measures, some locals argue the freeway is simply too close.

“These vets are going to be sucking in these diesel fumes. It’s going to shorten their lives,” said Mike O’Gara, who lives eight blocks away and is a veteran of the U.S. Naval Air Forces. “What a hell of a great reward for serving their country.”

## Unpleasant choices

The Sun Valley project offers a window into the unpleasant choices faced by politicians, real estate developers and nonprofit groups as they struggle to counter rising rents and a surge in homelessness, which grew 23% this year across Los Angeles County, to nearly 58,000 people.

Los Angeles, a city crisscrossed by freeways, is embarking on a \$1.2-billion plan aimed at financing 10,000 homes for homeless people. Land next to those corridors — often cheaper and less likely to spur outcry from neighborhood groups — will be tempting to build on.

If policymakers put low-cost housing next to freeways, they will place some of their poorest constituents in locations where pollution can be five to 10 times higher, saddling them with the health consequences. But if they prohibit new construction in those areas, they could make things tougher for people trying to get off, or stay off, the streets.

Of the roughly 2,000 affordable housing units approved in Los Angeles in 2016, 1 in 4 was within 1,000 feet of a freeway, according to figures from the Department of City Planning. Officials are weighing whether to build homeless housing on at least nine city-owned properties within 500 feet of freeways — including one that's less than 200 feet from the sprawling 110-105 freeway interchange.





Housing advocates argue that homeless Angelenos are already living near freeways. In L.A.'s Sun Valley neighborhood, Joe Carmelo has a campsite along the 5 Freeway, not far from the site of the planned senior veteran apartments. (Genaro Molina / Los Angeles Times)

Housing advocates point to studies that link homelessness to early deaths from drug use, respiratory disorders and other health problems. Homeless individuals are also less likely to obtain access to healthcare, mental health services and substance abuse counseling than those who have shelter, said Mike Alvidrez, chief executive of Skid Row Housing Trust, which has built 1,800 units of housing since 1989 — including one building next to the 10 Freeway.

“We know that people die sooner if they don’t get off the street and into housing. We just know that,” he said. “So if you have a solution that going to prolong someone’s life — irrespective of whether it’s the worst place you could put it, next to a freeway or next to two freeways — if you don’t have another option, that’s what you do.”

Across the region, homeless people are already living near freeways — in tents tucked along sound walls, in campsites obscured by shrubbery. Jason McKenney, 34, said he has spent some nights in North Hollywood Park, which runs along the 170 Freeway.



Jason McKenney, right, said he has spent some nights in a park near the 170 Freeway in North Hollywood. (Genaro Molina / Los Angeles Times)

Sitting under a tree nursing an injured leg, the onetime construction worker said he would have no qualms about moving into a building next to a freeway, if it had cheap rents and counseling for substance abuse.

“I would jump at that chance,” he said.

## **Apartments near transit**

With climate change now a top priority, California has embraced policies to cut carbon emissions by packing dense housing near jobs and transit. State leaders have set aside nearly \$700 million from the cap-and-trade program to finance transit-oriented developments and infrastructure.

The planned Sun Valley development is on a noisy stretch of Laurel Canyon Boulevard with high-speed traffic and few walkable businesses. But because it's near a bus stop, the project was eligible for cap-and-trade funds.

To boost transit use near the senior housing complex, a portion of those funds will go toward free bus and rail passes for the tenants, as well as new crosswalks, sidewalks and wheelchair ramps.

Like many projects that have received cap-and-trade money, the project is in a location that already endures a heavy pollution burden, which helped it qualify for state funds. The application for cap-and-trade money acknowledged the neighborhood has high rates of asthma.





The planned Sun Valley Senior Veterans Apartments was eligible for state funding, in part, because it will go up near a bus stop. (Genaro Molina / Los Angeles Times)

Some in the neighborhood, such as 75-year-old Joan Winget, see the freeway as a serious health threat. Diagnosed with emphysema in 2012, Winget has lived more than 20 years in a mobile home park right next to the senior housing site.

The retired property manager smoked cigarettes until 1979, and her health issues are linked at least in part to that habit. But she worries her medical problems have been exacerbated by pollution from the nearby 5-170 freeway interchange, whose swooping ramps can be seen from the property's driveway.

Each day, about 200,000 vehicles on the 5 pass her home. To protect herself, Winget keeps her doors and windows closed 24/7 and the air conditioning running around the clock. She misses the days when she let a breeze blow through her home late at night.

"I hate it," she said. "I love fresh air. I like getting outside. I don't like being stuck in the house all the time. I might not be getting the greatest air in here, but it's worse outside."



Joan Winget, 75, stands inside her home next to the 5 Freeway in Sun Valley. In an effort to protect herself from car and truck pollution, she keeps her air conditioner on, and her windows closed, around the clock. (Genaro Molina / Los Angeles Times)

Regulators say decades of tough clean-air rules have slashed tailpipe emissions, reducing risks to people near freeways. But some scientists warn those health improvements will be undercut by the state's push to concentrate high-density housing near transit hubs, which often sit near major roadways.

A 2016 study projected state climate policies would increase the number of preventable deaths from heart disease in Southern California by placing more people near traffic pollution. Establishing buffers between homes and heavy traffic, in contrast, would decrease heart disease deaths, especially among the elderly, according to the study by researchers from USC, the California Department of Public Health and several other institutions.



The state Air Resources Board — which since 2005 has recommended municipalities “avoid siting” homes within 500 feet of freeways — oversees the spending of billions of dollars in cap-and-trade funds by a dozen state agencies. But the board does not select the affordable housing projects that get the money. Those decisions rest with the Strategic Growth Council, a committee appointed by the governor and state lawmakers.

Records show the Strategic Growth Council voted unanimously to award funds for apartments next to the 110 Freeway in Los Angeles, housing along Highway 99 in Turlock and a 135-unit building in San Jose that’s just 25 feet from Highway 87, a location a state analysis ranks in the 95th percentile for diesel emissions.



State cap-and-trade funds are being used to finance two affordable housing developments going up next to the 110 Freeway in L.A.’s Harbor Gateway neighborhood. (Genaro Molina / Los Angeles Times)

At least one member of the panel, Manuel Pastor, said he was unaware he had voted for housing so close to freeways.

Pastor, who directs USC’s Program for Environmental and Regional Equity and has written on the health implications of building near roadway pollution, said the issue

never came up when the projects were being considered.

“Your pointing out the exact location of these projects is the first time it has come to my attention,” said Pastor, an appointee of State Senate leader Kevin de León. “I have not until now asked for a map of where these things are.”

## ‘Poor planning and bad zoning’

The push to build homes on the Sun Valley site began more than a decade ago, just as Los Angeles city officials were starting to reckon with the health risks posed by freeway-adjacent development.

Initially, the zoning for the site allowed for just three homes. The City Council hiked that number to 26 in 2008, at the request of the property’s owners. Three years later, the same developers asked the city to increase the number again, taking it to 96.



Sources: Los Angeles Department of Building and Safety, Google Earth, Mapzen, OpenStreetMap

@latimesgraphics

The planned Sun Valley site will be wedged between a mobile home park and the Sheldon Street off-ramp. It will stand about 200 feet from Interstate 5. (Jon Schleuss / Los Angeles Times)

Each step of the way, there were warnings about freeway pollution — first from planning commissioners, then neighbors, and finally the South Coast Air Quality Management District. Early on, one mayoral appointee called it an example of “poor planning and bad zoning.”

But the developers had a champion in U.S. Rep. Tony Cardenas, who represented the area.

Cardenas and two of his allies, then-State Sen. Alex Padilla and then-Assemblyman Raul Bocanegra, urged city leaders in 2013 to allow a 96-unit elder care facility to go up on the site. All three have received a steady stream of political contributions from developers, architects and others who worked on the Sun Valley development — at least \$70,350 over the last 15 years, a Times review of donations found.

The elder care project was approved, and in 2015, the owners sold it for \$3.5 million, more than three times the amount paid in 2006, when only three homes could be built on the site.

Neither Cardenas nor Bocanegra would comment for this story. Padilla, now California’s secretary of state, said he supported the project because it offered “affordable living options for senior citizens.”

Businessman David Spiegel, one of the project’s developers at the time, said he followed the city’s rules. “There are hundreds of thousands of units that have been and are currently being built on the freeway,” he said, “so any impacts must be acceptable to city, state and federal agencies.”

## **Sealing windows shut**

The property was purchased by the East L.A. Community Corp., a nonprofit housing developer with experience putting low-income housing next to freeways. ELACC, as the group is known, had already built 33 apartments for homeless veterans along the 5



Freeway in Boyle Heights. At that location, windows facing the freeway are sealed shut and the air conditioning system has higher-rated filters.

Isela Gracian, the nonprofit group's president, said many of L.A.'s low-income neighborhoods were carved up by freeways decades ago. That, she said, makes it difficult to find properties far from car and truck pollution.



Backers of the Sun Valley project say many of L.A.'s low-income neighborhoods are carved up by freeways, making it difficult to find affordable housing sites away from freeway pollution. (Genaro Molina / Los Angeles Times)

“Not every piece of land is available to us,” she said. “Whoever currently owns the land has to be willing and open to selling the property. It’s not like we can walk the streets and say, ‘This is a better location — let’s swap the project and move it over here.’ ”

Still, one agency in Los Angeles County has managed to avoid putting its money into projects along freeways.

The county's Community Development Commission, which provides tens of millions of dollars in low-interest loans to affordable housing developers each year, decided in 2008 that it would not allow its money to finance projects within 500 feet of a freeway.

Kathy Thomas, who heads the agency, said that decision was made in response to warnings about the health hazards of traffic pollution from the Air Resources Board and other regulators. Yet even with that limitation, the commission finances hundreds of units of housing each year — and receives more requests for money than it has to lend, she said.

“We have not had any difficulty finding projects,” Thomas said in an email. “Our freeway buffer requirement is well-known among developers and we really don't get any pushback.”

Thomas said it would be “negligent” for her agency to knowingly put low-cost housing next to freeways and undermine the county's work in reducing “the cost burden of frequent users on the healthcare system.”

Some officials want similar conditions on the spending of cap-and-trade funds.

Dean Florez, a former state senator who sits on the Air Resources Board, said California should stop using cap-and-trade money for housing near freeways. Those projects, he said, “will endanger people's lungs for decades.”

The Strategic Growth Council is moving ahead without such restrictions as it accepts applications for another \$255 million in affordable housing funds.

Agency officials will score projects by proximity to transit, greenhouse gas reductions, walkability and other criteria. One thing they won't measure is how close the projects are to freeway pollution.

**Times staff writers Doug Smith and Jon Schleuss contributed to this report.**

**tony.barboza@latimes.com**

**Twitter: @TonyBarboza**

**david.zahniser@latimes.com**

**Twitter: @DavidZahniser**

## **UPDATES:**

**Dec. 18, 9:50 a.m.:** This article incorrectly says Kathy Thomas heads Los Angeles County's Community Development Commission. She heads the agency's Economic and Housing Development Division.



Tony Barboza

Tony Barboza is an editorial writer focusing on climate change and environmental justice. Before joining the editorial board in November 2021, he worked for 15 years as a news reporter for the Times' California section, covering air quality, climate change, environmental health and other topics. Barboza was born and raised in Colorado and is a graduate of Pomona College.



David Zahniser

David Zahniser covers Los Angeles City Hall for the Los Angeles Times.

**Community Development Department**  
214 South C Street  
Oxnard, CA 93030  
(805) 385-7868  
Fax (805) 385-7417  
www.oxnard.org



December 6, 2023

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

**Subject: City of Oxnard's Comments on SCAG's Draft Connect SoCal 2024 Plan**

Dear Ms. Wagner:

Thank you very much for the opportunity to review and comment on the Draft Connect SoCal 2024 Plan. Our comments are as follows:

1. 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.
2. 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.

December 6, 2023

City of Oxnard Comment on SCAG's Draft Connect SoCal 2024 Plan

Page 2 of 2

If you have questions, please feel free to contact Jasmin Kim at (805) 385-3945 or [Jasmin.Kim@oxnard.org](mailto:Jasmin.Kim@oxnard.org).  
Thank you.

Sincerely,



Kathleen Mallory, AICP, MA, LEED GA  
Planning & Sustainability Manager

C: Ashley Golden, Assistant City Manager

Jeff Pengilley, Community Development Director

Jasmin Kim, Principal Planner

Vanessa Rauschenberger, General Manager, Gold Coast Transit District

Amanda Fagan, Planning and Sustainability Director, Ventura County Transportation Commission





Community Development  
Department  
Planning Division

*City of Arts & Innovation*

January 12, 2024

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

Subject: City of Riverside's Review of the SCAG Draft Connect SoCal 2024 Regional Transportation Plan

To whom it may concern,

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

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

The City has reviewed the draft plan, and we wish to provide the following comments:

Public Works – Traffic Engineering Division:

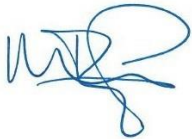
- **Chapter 2 – Our Region Today**
  - **Sustainable Communities – City of Riverside PACT (PG. 68-69)**
    - We appreciate SCAG highlighting the City of Riverside PACT document as one of the recent Sustainable Communities Programs. We would like to supplement this information by requesting that SCAG consider adding the following information regarding recent grant awards received that were supported by the PACT document:
      - 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.
      - 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.
  - **Chapter 3 – Our Plan**

- The draft plan should be amended to include support for grade separations at existing at-grade crossings. SCAG should also provide additional detail regarding its role in implementing 15-minute communities across the region.
- 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.
- 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.

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

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

Sincerely,



Matthew Taylor  
Principal Planner

cc: Patricia Lock Dawson, Mayor  
Riverside City Council Members  
Mike Futrell, City Manager  
Rafael Guzman, Assistant City Manager  
Jennifer A. Lilley, Community and Economic Development Director  
Maribeth Tinio, City Planner  
Gil Hernandez, Public Works Director

**From:** [Garibaldi, Camille \(FAA\)](#)  
**To:** [Gore, Scott \(FAA\)](#)  
**Cc:** [Globo, Victor \(FAA\)](#); [Carlini, Joseph \(FAA\)](#); [Schaffer, Chris \(FAA\)](#); [Garcia, Faviola \(FAA\)](#)  
**Subject:** RE: SCAG Regional Transportation Plan (Connect SoCal 2024) Open for Public Comment (Until January 12, 2024)  
**Date:** Tuesday, December 12, 2023 4:16:14 PM  
**Attachments:** [23-2987-tr-connect-socal-2024-aviation-airport-ground-access-draft-110223.pdf](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Hi Scott,

Victor and I took a quick look at the attached SCAG Regional Transportation Plan and it contains quite a few inaccurate statements regarding the FAA role, jurisdiction, and airport specific matters. It appears some of the information resources quoted are sources other than the FAA.

Examples:

- Page 4, Section 2.2 Airports and the Federal Aviation Administration (FAA):
  - Recommend that the FY-2023 National Plan of Integrated Airport Systems available at [https://www.faa.gov/airports/planning\\_capacity/npias/current](https://www.faa.gov/airports/planning_capacity/npias/current) be considered as a source to update and clarify airport roles within the system.
  - The discussion should clarify that airports are owned by public agencies and in certain instances private entities (Airport Sponsors).
  - First paragraph, last sentence, should be revised to clarify that the planning and operations at airports are primarily the responsibility of the Airport Sponsors.
  - 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).
  - 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.
  
- 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.<sup>17</sup>” Footnote 17, Federal Aviation Administration (FAA): Airport Noise and Land use Information.
  - This statement is not correct, and the source is not properly identified as the FAA website.
  - Airport Noise Compatibility Planning (14 CFR Part 150) is a voluntary program. Information is available here [https://www.faa.gov/airports/environmental/airport\\_noise](https://www.faa.gov/airports/environmental/airport_noise)
  - 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](https://www.faa.gov/airports/environmental/airport_noise/noise_exposure_maps).

- 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.”
  - From the EIS Purpose and Need:  
“The Airport does not currently operate at or near its maximum theoretical operational capacity.<sup>22</sup> 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.<sup>23</sup> 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).<sup>24</sup> 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.”

Please provide these comments with any other review comments to SCAG for correction of their document.

Thank you,  
Camille

---

Camille Garibaldi  
Phone: 1 (424) 405-7287

---

**From:** Gore, Scott (FAA) <Scott.Gore@faa.gov>

**Sent:** Wednesday, December 6, 2023 5:06 PM

**To:** Girvin, Raquel (FAA) <raquel.girvin@faa.gov>; McClardy, Mark (FAA) <Mark.McClardy@faa.gov>; Woods, Jerome (FAA) <Jerome.Woods@faa.gov>; Cason, Cathryn G (FAA) <Cathryn.G.Cason@faa.gov>; Globa, Victor (FAA) <Victor.Globa@faa.gov>; Wong, Manson (FAA) <Manson.Wong@faa.gov>; Garibaldi, Camille (FAA) <Camille.Garibaldi@faa.gov>; Carlini, Joseph (FAA) <Joseph.Carlini@faa.gov>

**Cc:** Garcia, Faviola (FAA) <Faviola.Garcia@faa.gov>; Young, Carlette (FAA) <Carlette.Young@faa.gov>; Frelow, Larri (FAA) <Larri.Frelow@faa.gov>

**Subject:** RE: SCAG Regional Transportation Plan (Connect SoCal 2024) Open for Public Comment (Until January 12, 2024)



December 5, 2023

Delivered by Mail and Email

Kome Ajise, Executive Director  
Darin Chidsey, Chief Operating Officer  
Sarah Jepson, Chief Planning Officer  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

RE: Corrections to Draft Connect SoCal 2024

Dear Mr. Ajise, Mr. Chidsey and Ms. Jepson:

The Newhall Land and Farming Company is actively developing and entitling villages within and around the Newhall Ranch Specific Plan<sup>1</sup> as a mixed-use project ("Newhall Project"). The Newhall Project will offer a mix of homes, including affordable units, offices, retail, and entertainment options, while also devoting over 10,000 acres of open space.

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 zone ("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 us and advised that they will also provide you with updated household

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<sup>1</sup> Newhall is a subsidiary of Five Point Operating Company, LP ("FivePoint").

and employment projections consistent with our estimates in order to accurately reflect the Newhall Project's planned development.

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

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.

Thank you very much for your time and consideration.

Very truly yours,



Don Kimball  
Executive Vice President, Valencia Operations

cc: Amy Bodek, Planning Director of the County of Los Angeles

**Exhibit 1**  
**Stantec: Proposed Revisions to Draft SCAG RTP/SCS Zonal Data**





## Memo

To: Alex Herrell  
Newhall Land & Farming Company

From: Daryl Zerfass  
Stantec

Project/File: 2042604600  
Date: December 1, 2023

### Reference: Proposed Revisions to Draft SCAG RTP/SCS Zonal Data

In November 2024, the Southern California Association of Governments (SCAG) released the Draft Connect SoCal 2024 regional plan, which is Southern California's Regional Transportation Plan/Sustainable Communities Strategy. The Plan's draft socioeconomic data (SED) projections for year-2050 do not account for all the planned and approved development for the area generally encompassing the Newhall Ranch Specific Plan area and various other Newhall Land & Farming Company development areas west of the I-5 freeway in the Santa Clarita Valley, all of which development is covered by the County-adopted Santa Clarita Valley Area Plan, as outlined below.

Draft SED data provided by SCAG<sup>1</sup> has been compared to the amount of development outlined in the approved Specific Plan and the Santa Clarita Valley Area Plan, as quantified in the Westside Santa Clarita Valley Roadway Phasing Analysis. The amount of planned residential housing units and employment projections provides future development of 25,829 residential units and non-residential uses to accommodate approximately 43,735 future employees<sup>2</sup> within the area. In comparison, the draft SED data indicates substantially less growth than anticipated and less overall development than was included in the previously adopted forecasts for year-2045. The following tables summarize the adopted year-2045 forecasts, the draft year-2050 forecasts, and our proposed year-2050 forecasts that account for the area's planned growth consistent with the Specific Plan and Santa Clarita Valley Area Plan. Attached for reference is a map illustrating the indicated traffic analysis zone boundaries.

TAZ	Households (DU)			TAZ	Commercial (Jobs)		
	Adopted 2045	Draft 2050	Proposed Corrected Draft 2050		Adopted 2045	Draft 2050	Proposed Corrected Draft 2050
20224100	2,666	1,696	2,720	20224100	11,248	11,240	12,296
20224200	0	2	2	20224200	8,564	1,988	12,788
20226100	26,812	17,552	24,076	20226100	29,160	18,125	37,765
20227100	7,177	4,510	7,000	20227100	1,372	6,501	6,917
<b>Total</b>	<b>36,655</b>	<b>23,760</b>	<b>33,798</b>	<b>Total</b>	<b>50,344</b>	<b>37,854</b>	<b>69,766</b>

Feel free to contact me if you have questions on the above material.

Sincerely,

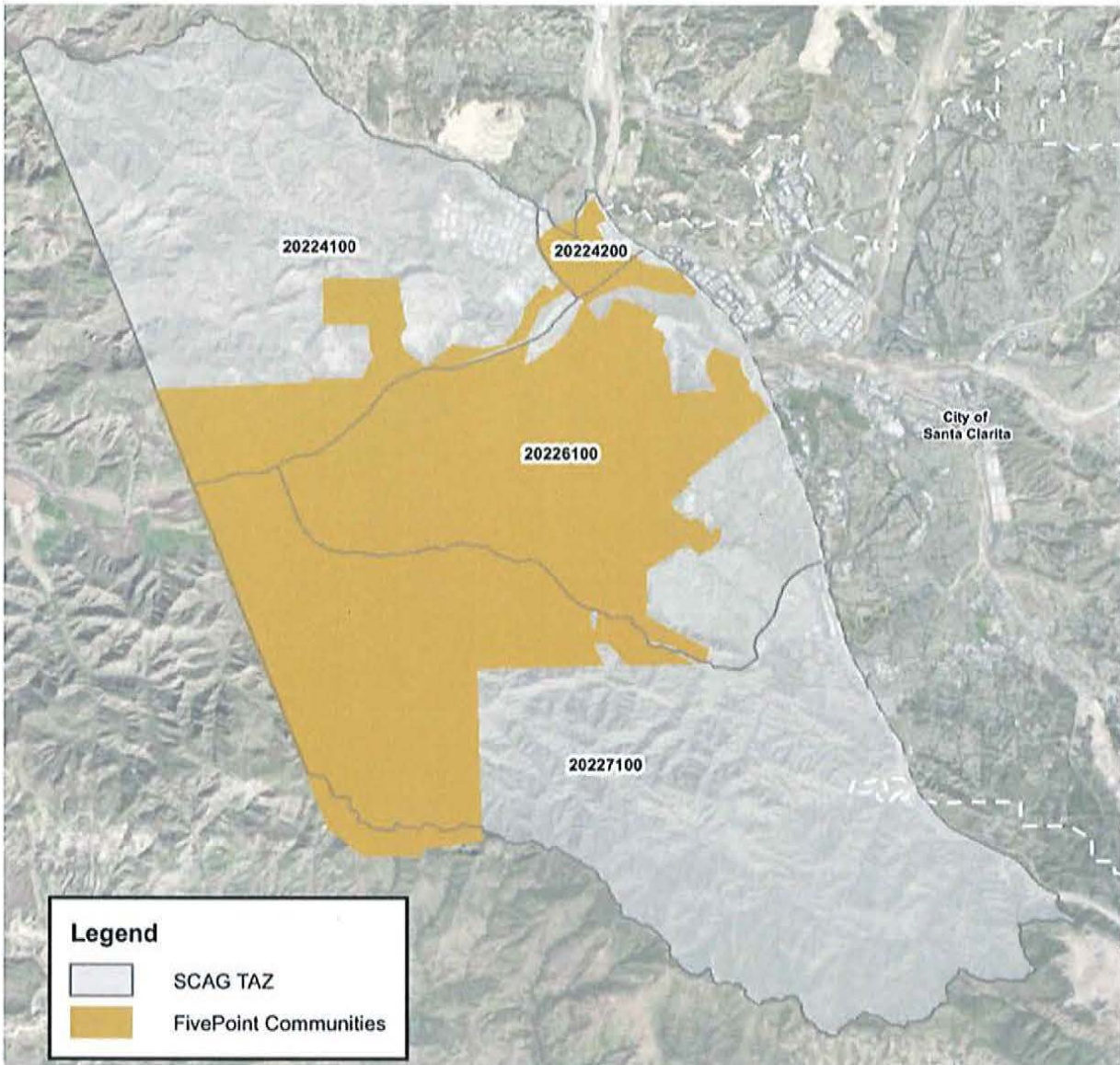
**STANTEC CONSULTING SERVICES INC.**

**Daryl Zerfass** PE, PTP  
Principal, Transportation Planning & Traffic Engineering

Attachment: SCAG TAZ Boundary Map

<sup>1</sup> 03\_scag\_drtp24\_citytier2taz\_092523.xlsx, obtained October 3, 2023

<sup>2</sup> Based on the allowable square footage and type of jobs anticipated





# Natural Lands Coalition Comments on 2024 Connect SoCal Documents



January 12, 2024

*Submitted via mail to SCAG*

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

RE: Comments on the 2024 Draft Connect SoCal

Dear Connect SoCal Team:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2024 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) called Connect SoCal. In 2012, with the release of that RTP/SCS, Friends of Harbors, Beaches and Parks (FHBP) coordinated a cross-county regional conservation coalition

(the Coalition) focused on the inclusion of natural lands, farmlands, and associated policies within the SCAG RTP/SCS. The Coalition continues to be diverse, inclusive, and well distributed geographically. **Our Coalition includes unincorporated community groups at the local level all the way up to national conservation non-profits.**

Direct quotes from the Plan are in *italics*.

Proposed policy modifications are underlined.

Our questions and comments are in **bold**.

Resources SCAG should review and/or incorporate are in tables.

We are pleased to see SCAG advancing the preservation of the environment by including it as one of the four core goals. As stated in the plan, “*The goals for Connect SoCal are designed to help us achieve our vision. They fall into four core categories: mobility, communities, environment, and economy. These goals are not mutually exclusive—they are mutually reinforcing.*” (pg. 12) **Recognizing the interconnectedness of these core categories is a step in the right direction.**

We’ve reviewed the RTP/SCS and offer the following comments and clarifying questions for consideration in the Plan with the intent to make clearer and strengthen the Plan’s language. Further, we hope to link the goals of the RTP to SCAG’s aim of reducing greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) per AB 32 and SB 375. These goals also align well with the recently codified SB 337—protecting 30% of the state’s lands and waters by 2030—by encouraging housing placement in appropriate urban locations, while simultaneously conserving habitat lands, riparian areas, and creating climate resilient landscapes.

SCAG has a tremendous opportunity with the 2024 Plan. The State has provided ambitious reduction targets for both GHG emissions and VMT for passenger and light duty vehicles. Conservation of our natural lands can have a significant role in both. Converting land from its natural state to more urban uses increases GHG emissions—while leaving land as is, allows the vegetation and soil to continue to sequester carbon. Further, most greenfield developments are at the urban fringe in Green Region Resource Areas (GRRAs)—far from services, transit, and amenities, thus increasing both GHG emissions and VMT. **Preservation of GRRAs sites will eliminate the need for any VMT for projects that could have been built. In other words, conservation of natural and farmlands can reduce both GHG and VMT to help SCAG achieve its mandate.**

In 2023, Governor Newsom signed SB 337 (Min-D) into law requiring the state to protect 30% of California’s lands and coastal waters by 2030 (30x30). The California Natural Resources Agency has identified in its [Pathways to 30x30 document](#), 10 strategies to achieve this. These include concepts like executing strategic land acquisitions to institutionalizing advance mitigation. There are also three priorities: protect and restore biodiversity, expand access to nature, and mitigate and build resilience to climate impacts. **SCAG has an unprecedented opportunity to align Connect SoCal and its strategies and policies with the existing 30x30 effort. We collectively urge SCAG to capitalize on this opportunity.**



Much of the last four years has been spent by the Coalition engaging on the SoCal Greenprint and in SCAG's Natural and Farmlands Working Group. **The Coalition continues to believe SCAG has the leadership in place, the right staff at the helm, the homework done, the support by the conservation community, and the interest and attention of the permitting agencies to now transition to implementing conservation activities.** This is your opportunity to walk the walk, instead of simply talking the talk. We stand ready to help conserve and restore land throughout Southern California for the benefit of its millions of residents.

First and foremost, we applaud your efforts at community engagement in the development of the 2024 Plan. SCAG partnered with 16 community based organizations, FHBP included, that hosted 20 pop-up events and collected over 3,600 survey responses. This engagement was integral to developing a plan that reflects the needs and desires of the region. We hope this outreach and engagement continues with plan implementation. That said, **we were disappointed with the comment submission limitations on the SCAG website, which allows one comment at a time (up to 25) to be submitted by one individual entity. This approach, while it makes sense to organize comments at SCAG's end, hinders public participation from the community side—especially Coalitions.** While we outreached to staff to solve this problem and submit the letter electronically, not everyone else likely had this wherewithal.

The Coalition has two general questions:

1. The Connect SoCal Executive Summary states on page 10, "*SCAG will collaborate with federal, state, and local partners to ensure that the implementation of the Plan helps address existing air-quality challenges, preserve natural lands, and reduce GHG emissions.*" **How will SCAG ensure these three important objectives are achieved during the Plan's implementation? There are performance measures, but not consequences if goals aren't met.**
2. We understand the baseline population is updated every five years. However the past five years, in particular, changed the working and living landscape for the foreseeable future and these changes aren't included in the 2019 baseline. **How were the Plan's policies adjusted given the stated decline in the region's population from 2019-2023 and the recent trend of working from home post-COVID? We believe a stronger explanation of this noticed trend is warranted within the document—even if it is called out as a footnote.**

### ***CONNECT SOCAL EXECUTIVE SUMMARY***

The Plan states, on page 10, "*The impacts of climate change also exacerbate underlying health risks in vulnerable and historically marginalized communities. In addition, urbanization continues to consume farmlands and open spaces, which contributes to the loss of groundwater supply and habitat areas that play a critical role in strengthening the region's resilience. SCAG will collaborate with federal, state, and local partners to ensure that the implementation of the Plan helps address existing air-quality challenges, preserve natural lands, and reduce GHG emissions.*" **How exactly will SCAG effectively collaborate with all its jurisdictions, county transportation commissions, and the environmental community to ensure the Plan's environmental goals are met?**

## **CHAPTER 2: OUR REGION TODAY**

### **2.2 NEW AND EVOLVING TRENDS**

#### **Resilience**

According to the Plan, “Resilience is defined as the capacity of the SCAG region’s built, social, economic, and natural systems to anticipate and effectively respond to changing conditions, acute shocks and chronic stressors by creating multiple opportunities for a sustainable, thriving, and equitable future.” (pg. 36) The Coalition believes SCAG does a good job of considering the resilience in economic systems, natural systems, and social systems, but falls short of examining resilience to the built environment. **Given the stressor of sea level rise, we recommend that SCAG closely examine the vulnerabilities at the coast and provide policies to implement to ensure our built systems such as transportation and utilities can withstand the challenges posed by sea level rise.**

We recommend reviewing the following information for policies and ideas that SCAG should incorporate into the Plan:

<b>Author</b>	<b>Resource</b>
Ocean Protection Council	<a href="#">Sea Level Rise Policy Guidance</a>
California Coastal Commission	<a href="#">Critical Infrastructure</a>

Further, **we believe thoughtful, strategic planning can accommodate both shocks and stressors. SCAG is in the unique position to help jurisdictions do just that and provide funding for the assessments, planning, and mitigation.**

#### **SECTION 2.3 REGIONAL CHALLENGES**

We applaud SCAG for its excellent effort to engage as many community members, community-based organizations, and stakeholders’ input to inform the development of the Plan. The effort made the Plan better and validated its policies. Our regional challenges to building more housing are summarized well in the statement, “Not only does it include construction costs, such as the cost of land, materials and labor, but local land use entitlement processes and environmental requirements can also add cost to the process.” (pg. 49) **Another core challenge that requires examination is land availability to construct the region’s needed housing through 2050.**

## **CHAPTER 3: THE PLAN**

On page 78, the Vision and Goals are outlined in terms of Leadership, Implementation, and Evaluation. Evaluation is a measurement of implementation, and **we would like further information regarding the benchmarks used for the evaluation and monitoring.**

### **SECTION 3.2: THE HEART OF THE PLAN**

#### **A Vision for 2050**

According to the Plan on page 85,

“Environment:

- *Create a healthy region for the people of today and tomorrow*

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

**Given the vision outlined for the environment, and given the reduction in predicted population growth coupled with the increased environmental stressors, what policies in particular will accommodate these facts? There are performance measures, but not consequences if goals and subgoals aren't met. How will SCAG ensure these goals and subgoals are achieved during the Plan's implementation?**

### ***Priority Development Areas (PDAs)***

We acknowledge the regional challenge associated with needing new affordable housing to accommodate our growing population, and the simultaneous challenge with making sure those new units are built near transit areas, is city-centered, is walkable/bikeable, and does not build on greenfield sites or high risk areas (like those prone to wildfires or sea level rise). Additionally, during the public engagement process, thousands of people across the region reflected on the challenges facing Southern California, and the community's top concerns are: housing affordability, limited reliable travel options other than driving, and climate change impacts.

PDAs account for 8.4 percent of the region's total land area, and according to the Plan, implementation of SCAG's recommended growth strategies will help these areas accommodate 67% of forecasted household growth and 55% of forecasted employment growth between 2019 and 2050. **What are SCAG's strategies for ensuring this is accomplished?**

### ***Green Region / Resource Areas (GRRAs)***

On page 103, **we support SCAG's effort to de-emphasize development in areas that fall under multiple convergences of GRRAs given the higher level of environmental impacts that would require additional mitigation measures.**

### ***Natural and Agricultural Lands Preservation***

On page 107 of the Plan, in addition to the environmental and community benefits, these lands hold enormous economic values related to agricultural product sales, agricultural employment, enhanced viewshed and therefore increased property values, recreational spending, to name some. **SCAG should also acknowledge the economic benefits of natural and agricultural lands.**

### ***The Future of Prosperity***

#### ***Tourism***

The Coalition appreciates SCAG's attention to tourism and recreation in the region. From the local and regional parks and coastal resources to the state and federal ones—Southern California has many opportunities to enjoy and recreate in the protected lands and waters regardless if you live/work in the region or are here as a tourist. **What's missing from this section is an accounting of how access to parks and the coast substantially contribute to the economy.**

Parks not only generate jobs, but also economic activity, increase residential property values, reduce pollution, improve local tax revenues, increase well-being (thereby reducing medical costs), provide stormwater benefits by capturing precipitation, and much more. Nationally outdoor recreation generated \$1.1T in economic output, exceeding motor vehicle manufacturing and performing arts.

We recommend the following information be analyzed for inclusion in the Plan:

Author	Resource
National Recreation and Parks Association	<a href="#">The Economic Impact of Local Parks</a>
The Trust for Public Land	<a href="#">The Economic Benefits of the Public Park and Recreation System in the City of Los Angeles, California</a>
Headwaters Economics	<a href="#">The Outdoor Recreation Economy by State</a>
Institute for Local Government	<a href="#">The Economic Benefits of Open Space, Recreation Facilities and Walkable Community Design</a>

### ***SECTION 3.3: REGIONAL PLANNING POLICIES***

#### ***Environment***

On page 118, policy 53 states supporting investments to reduce hazardous air pollutants and GHG emissions. **Are there specific investments SCAG can prioritize and encourage?**

On page 119, policy 59 correctly identifies that the economic benefits of natural and agricultural lands must be prioritized. SCAG recognizes economic benefits of these natural and working lands. **We encourage SCAG to also acknowledge the existence of harder to quantify economic benefits in terms of viewsheds and their relationships to increased property values and well-being.**

Policy 62 on page 119 encourages the protection and restoration of wildlife corridors. **What implementation or mitigation measures will encourage the development and protection of wildlife corridors?**

Policies 67, 68, and 69 on page 119 provide an incredible opportunity to promote individual residential and commercial water storage activities. There are many places throughout the Plan where rainwater storage capture could be required prior to the issuance of a building permit. This is an opportunity for SCAG to take a localized approach to water management. For example, [King City, CA](#) requires all new development to capture all stormwater onsite and recharge the aquifer onsite—going above and beyond related state regulations. This is another way for SCAG to plan for the forecasted shocks and stressors as outlined in Section 2.2. **Has SCAG explored recommending such permitting restrictions?**

### ***Section 3.4 Plan Fulfillment***

#### *Natural and Agricultural Lands Preservation*

On page 132, SCAG is leading the identification and leveraging resources for, “*research, policies and programs to conserve and restore natural and agricultural lands.*” **Has SCAG developed criteria for identification?**

Also on page 132, SCAG is the lead to, “*Explore opportunities to increase and quantify the carbon sequestration potential and resilience benefits of natural and agricultural lands—and pursue funding for implementation and demonstration projects.*” **We request that SCAG ensure the added economic benefits of agriculture land viewsheds and open space / recreation are not only considered, but also included.** Further, chaparral habitat is found in all SCAG counties. Information related to sequestration potential for this habitat type would benefit the entire SCAG geography. **We request SCAG provide details on how it intends to quantify sequestration potential. And, how will implementation and demonstration projects be selected?**

### ***Section 4.2 Economic Outlook***

#### *Overview*

**SCAG’s financial model should also include the availability of raw land.**

#### *Retail Sales Growth*

SCAG should include in this section **retail sales growth from open space / recreation activities. Also, open space / recreation activities are generally not impacted by economic slowdowns and recessions; rather usage increases—as seen during COVID.**

### ***Section 5.1 Performance Outcomes***

#### *Performance Monitoring*

#### *Plan Performance*

On page 176, the Environment plan performance is identified as, “*Will people and our environment become healthier?*” The Plan outlines specific metrics for environmental health (i.e., air quality, wildlife corridors, increased quantity of flora and fauna). **It isn’t clear from the Plan what “healthier” looks like for SCAG residents. Please define this.**

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

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

This car-centric focus goes against the concept of a 15-minute city, urges people to continue to use GHG intensive methods to get to parks, and is outdated in its approach. **SCAG should focus on a 15-minute walk or ride to a park. The Trust for Public Land has a tool that calculates a community’s “[ParkScore](#),” which provides on-the-ground information about park equity for communities and the greater SCAG region. These performance measures should be redrafted to focus on pedestrian-oriented access to parks.**

Also on page 181, the table indicates that the baseline land conversion to urban purposes is 78 square miles and under Connect SoCal it is 40. The Comparative Benefit Analysis (p. 184) indicates a savings of 37 square miles (**should it be 38 square miles saved?**), which would equate to 24,320 acres. **If Connect SoCal actually achieves land preservation as is identified in the Comparative Benefit Analysis, then why does the Land Use Appendix (pg. 44) only identify 1,891 acres as “improved” or ~2.8 square miles?** Further, there are inconsistencies between the Connect SoCal baseline numbers and natural lands conversion with those found in the Land Use Appendix. **Connect SoCal and the Land Use Appendix that should match acreages/square miles.**

### **Glossary**

The Coalition believes that the SB 337 should be added to the Glossary in that it directly ties to SCAG’s Plan and performance measures.

### **LAND USE APPENDIX**

#### ***Section 2.4 California State Wildlife Action Plan (SWAP)***

The most recent update of the SWAP is from 2015 and is therefore almost nine years old. **Can the information be supplemented with new data and information available by the California Department of Fish and Wildlife and/or United States Fish and Wildlife Service?**

#### ***Section 2.5 SCAG SCS Land Use Priorities***

Given the importance and adoption by SCAG’s Regional Council of the SCAG Climate Resolution, **we request again that SCAG add mitigation measures for disruptions to services from infrastructure damage due to sea level rise.**

As outlined in Section 2.5.2, SCAG’s Water Resolution, *“In October 2022, SCAG’s Regional Council adopted its Water Action Resolution (Resolution No. 22-647-3).”* The Resolution calls on SCAG to, *“identify, recommend and integrate into Connect SoCal 2024 policies and strategies to align investments in water infrastructure with housing needs and the adopted growth forecast and development pattern.”* *Connect SoCal 2024’s water resilience regional planning policies and implementation strategies that fulfill Regional Council’s direction are included in Section 6.2.2.”* **We encourage SCAG to think outside the box and truly be innovative in recommending water resilience and conservation policies, including strengthening stormwater aquifer recharge policies, and residential rainwater catchment for landscaping. As we’re all aware, 70% of water usage by a single family home is landscaping which provides a huge opportunity to achieve greater drinking water resiliency by eliminating the use of drinking water for landscaping purposes.**

#### ***Section 2.5.3 Pathways to 30x30 Strategy***

As mentioned above, we are encouraged by SCAG’s connection of the Connect SoCal Plan with Governor Newsom’s signed Executive Order N-82-20 that aims to combat the climate and biodiversity crises by conserving 30% of California’s land and coastal waters by 2030. **Since SB 337 now codifies 30x30, it should be incorporated into the Plan. SCAG’s work can easily align with SB 337 and meet local, regional, state and federal conservation goals. Further,**

**there are co-benefits to protecting landscapes including securing cultural, paleontological, and archaeological sites for permanent preservation.**

### ***Section 3.2 Natural and Farmlands***

We appreciate the mention that Southern California, as part of the California Floristic Province, is one of the 25 top biodiversity hotspots on the planet. Unfortunately, we lost 50,000 natural lands acres and 40,000 acres of farmland between 2012 and 2019 to development. This is unacceptable because it's unsustainable, and it doesn't align with the State's 30x30 Goals. One way to combat the loss of such valuable lands is to place the proper value of these lands. Natural and farmlands are not vacant lands, but resources that have value above and beyond what's listed by SCAG on page 11. **Please ensure other values such as viewshed values, ecosystem services, and recreational spending are included.**

### ***Section 4.3 Resilience Shocks and Stressors***

In the chart on page 18, infrastructure failure is listed under a shock and aging infrastructure is listed as a stressor. **Please provide additional mitigation measures and policy objectives related to infrastructure damage or loss due to sea level rise.**

### ***Section 5.3 Green Region Resource Areas Guiding the Forecasted Regional Development Pattern***

#### ***Rare, Threatened and Endangered Species and Plants & Sensitive Habitat Areas***

On page 31 of the Technical Report, there is listed multiple data resources for inventories, status, and locations of rare plants and animals in the SCAG Region and beyond. **We encourage SCAG to supplement the old, 2015 data in the SWAP with more relevant data from these sources when considering any policies and mitigation measures.**

### ***Section 5.5 Growth Forecast and Local Data Exchange (LDX)***

On page 36, it states, "*as part of the Local Data Exchange (LDX) process, SCAG conducted a survey to better understand the trends, existing conditions and local planning in the region....Of the 197 jurisdictions in the SCAG region, 46 percent completed the LDX Survey and provided integral feedback to frame local planning. Key findings include: Environmental - The most common natural lands conservation strategies used by local jurisdictions are development impact fees (47 jurisdictions), tree planting or other urban heat mitigation (40 jurisdictions), and hillside/steep slope protection (37 jurisdictions).*" **Please describe what SCAG learned from local jurisdictions regarding how the development impact fees are used to mitigate the environmental harms the fees were generated for.**

### ***Section 6.3 Natural and Farmlands Preservation***

As mentioned above, **the complete values of natural and farmlands should be considered when discussing its preservation. We also encourage the evaluation of local jurisdictions' success in using development impact fees collected to actually mitigate environmental harms. We express our strong support for the implementation strategy listed on page 45, "Work with implementation agencies to support, establish, or supplement Regional Advance Mitigation Programs (RAMP) for regionally significant transportation projects that help mitigate environmental impacts and reduce per-capita Vehicle Miles Traveled (VMT), and provide enhanced data on mitigation opportunities through the Intergovernmental Review**

*Process.*” **We believe regional mitigation projects and programs are more successful than individual local jurisdictional efforts to mitigate project impacts.**

#### ***Section 7.4 Summary of Plan Impacts and Benefits***

In the chart on page 55, comparing household mix (single family, townhome, multi-family) between the baseline (no Connect SoCal Plan) and the 2050 End State, or Connect SoCal Plan, the numbers could be better. While there shows a decrease in single family homes as an overall percentage, the increase in townhomes and multi-family homes are minimal. **Based on all the studies and data, we know that single family homes were over-built in the 1980-2000s. We anticipate the Connect SoCal policies and strategies would increase the number of multi-family permitting much greater than is outlined. If in fact, PDAs will be the focus of growth, the number of single family residential units would be lower than townhome and multi-family units, but it is not. Why?**

On page 57, the Coalition has numerous comments on the data presented:

- **Why are home insurance costs not represented in the household costs section?** The cost of home insurance has skyrocketed in the last five years, so much so that the majority of traditional homeowner insurance carriers have pulled out of the state (All State and State Farm), have excessive premiums for existing policy holders, and/or are creating staggering burdens on lower and middle income families. **Only including transportation and utility costs does not present a complete picture of contemporary household costs in the SCAG region.**
- **Why is the only public health data point related to respiratory health costs?** There are myriad health related data points that should be included such as obesity rates, longevity rates over time, birth rates, and exposure to toxins, pesticides, particulate matter, and contaminated groundwater. **Please review and include data from [CalEnviroScreen](#).**
- **In the Land Conservation section of the chart, we have the following concerns:**
  1. **Why is the active farmland and natural land converted HIGHER with Connect SoCal versus the baseline?**
  2. **Why is the habitat degraded only 1,202 acres less under the SoCal Plan versus the baseline?**
  3. **Why are the agricultural areas converted to urban lands 1,464 acres higher under the SoCal Connect Plan versus the baseline? Isn't the Plan supposed to improve the rate of conversion?**

#### **PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT (PEIR) / PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT (PEIS)**

The PEIR/PEIS includes two types of mitigation measures: SCAG Mitigation Measures (SMM) and Project-Level Mitigation Measures (PMM).

#### ***Implementation Strategies***

The Implementation Strategies (pg. 2-26 through 2-28) fail to adequately align with the proposed goals of Connect SoCal and the Project List. For example, to align with the goals and subgoals in the Plan, **the implementation strategies should include:**

- **A GHG / VMT Regional Advance Mitigation Program (RAMP).**



- **Actively funding conservation and restoration of natural and agricultural lands by willing seller landowners (instead of continued “research” activities.)**
- **Funding implementation of climate resilience projects (i.e, stormwater and rainwater capture, wetland restoration, wildland-urban interface restoration, managed retreat, freeway/roadway hardening, urban greening, community gardens, etc.)**
- **Support partner agency and non-profit applications to preserve and restore natural and farmland conservation and restoration.**
- **Develop toolkits of policies that combat climate impacts, including using nature-based solutions.**

#### *Aesthetics*

SCAG should include the SoCal Greenprint in SMM-GEN-1 (pg. 3.1-23), which we proposed to be modified to read:

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

#### *Agricultural Resources*

**The Coalition supports the SCAG Mitigation Measure (SMM) Agriculture (AG), specifically SMM-AG-2 and -3.** We hope that the recent progress on the SoCal Greenprint allows it to be launched in 2024 with the support of both environmental and building interests.

#### *Air Quality*

A GHG/VMT RAMP could further offset environmental impacts from Connect SoCal. SCAG has identified VMT mitigation measures in the Project List (see pg. 430) of \$500M, but fails to include a mitigation measure in the PEIR/PEIS to this effect. **To actually reduce GHG and VMT, SCAG should add a SMM that creates a GHG/VMT-centric RAMP. This mitigation measure would offset impacts from transportation projects not yet covered by a RAMP.** For example, the Orange County Transportation Authority’s Environmental Mitigation Program focuses on 13 freeway projects, but ignores the consequences of GHG and VMT from freeways, streets/roads, and transit for the remainder of the Authority’s transportation sales tax measure.

#### *Biological Resources*

Under the Biological Resources section (BIO), SMM-BIO-1, it states (page. 3.4-35), *“SCAG shall support research, programs, and policies that identify, protect, and restore natural habitat corridors and continue support for preserving wildlife corridors and wildlife crossings through information sharing, such as showcasing best practices and regional collaboration forums like SCAG’s Natural and Farm Lands Conservation Working Group.”* **To help meet the Plan’s goals to reduce land conversion, SCAG should actively support preservation of natural lands by agencies and land trusts/conservation groups, instead of simply focusing on the**

**research, programs, and policies behind the preservation. This will result in quantifiable acreages protected and restored.**

Due to the anticipated conversion of approximately 40 square miles of habitat into urban uses (See Connect SoCal, pg. 181), **the Coalition recommends that the PEIR include a SMM that creates fine-scale vegetation mapping of natural lands for the SCAG region to be incorporated into the SoCal Greenprint.** This will help public agencies and developers use mapping of plant taxa and vegetation types to improve project planning—especially as it relates to regional advance mitigation.

### **PROJECT LIST**

The Project List includes on page 429, \$1B for RAMP with an anticipated completion date of 2050. The purpose of RAMP is early permitting and project streamlining in advance of the project(s) actually being completed. **If 2050 is the anticipated completion date of the RAMP, then none of the mitigation will have been done in advance. The mitigation needs to be front loaded with early investment opportunities. If SCAG is serious about offsetting impacts through RAMP, the mitigation program(s) should be set up in advance—in the next five to seven years of this ~25 year plan.**

Thank you for the opportunity to provide these substantive comments on Connect SoCal, the Land Use and Communities Technical Report, Performance Measures, and PEIR/EIS. The Coalition looks forward to reviewing the revised plans.

Should SCAG have any questions regarding these comments, please contact [REDACTED]

Sincerely,

Michael Wellborn  
President  
Friends of Harbors, Beaches and Parks

Claire Schlotterbeck  
Executive Director  
Hills For Everyone

Gayle Waite  
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Laguna Canyon Conservancy

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The Wilderness Society

Garry Brown  
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Patricia Martz  
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California Cultural Resources Preservation  
Alliance, Inc.



January 7, 2024

Submitted via email to: [ConnectSoCal@scag.ca.gov](mailto:ConnectSoCal@scag.ca.gov) and [ConnectSoCalPEIR@scag.ca.gov](mailto:ConnectSoCalPEIR@scag.ca.gov)

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

RE: Comments on the 2024 Draft Connect SoCal Housing Technical Report

Dear Connect SoCal Team:

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

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

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

## **Housing Technical Report Comments**

### **Section 1. Executive Summary**

**The homelessness crisis should be mentioned in the Executive Summary.**

### **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?**

### **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.**

### 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.**

### 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?**

### Section 4.7 Homelessness

**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.**

### Section 5.1 Permits Issued

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?**

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?**

### **Section 6: Regional Best Practices**

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?**

Assembly Bill 101 is from 2019. **Do we know the outcomes from that funding to address homelessness and housing?**

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?**

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.**

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 (GRRA). **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. 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) Furthermore, if the population is trending toward decline (See Connect SoCal pg. 31), **why aren't the natural lands preservation numbers higher?**

### **Section 7: Best Practices for Jurisdictions and Stakeholders**

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 GRRAs—especially county unincorporated GRRAs. And again, retrofitting incomplete housing in those areas would be very beneficial to the housing stock.**

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 GRRAs. **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.**

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.)

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.)

### **Section 7.4 Housing Supportive Infrastructure and Utilities**

**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 GRRAs, 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.

### **Section 7.6 Anti-Displacement Strategies And Increasing Affordable Housing In High Resource Areas**

**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.**

### **Section 8.2 Implementation Strategies**

**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 stripmall are two opportunities for SCAG to include.

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?**

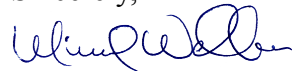
This is a great opportunity for SCAG to use its political capital to gain better policies locally and regionally that support additional housing, ensuring local control, and aligning Housing Elements with Connect SoCal.

**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?**

**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 GRR.**

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.

Sincerely,



Michael Wellborn  
President



January 3, 2024

Submitted via email to: [ConnectSoCal@scag.ca.gov](mailto:ConnectSoCal@scag.ca.gov) and [ConnectSoCalPEIR@scag.ca.gov](mailto:ConnectSoCalPEIR@scag.ca.gov)

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 900 Wilshire Blvd., Ste. 1700  
 Los Angeles, CA 90017

RE: Comments on the 2024 Draft Connect SoCal Land Use and Communities Technical Report

Dear Connect SoCal Team:

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

Below are our comments on SCAG's 2024 Connect SoCal Land Use and Communities Technical Report segmented by topic and chapter.

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

## Land Use and Communities Technical Report Comments

### Section 1 (Executive Summary)

On page 2, the Report states, "*SPM [Scenario Planning Model] results generally indicate that Connect SoCal 2024 is superior to the Trend/Baseline forecast—with highlights including nearly twice as much net growth in multi-family housing, more housing unit growth in PDAs, and reduced water and energy use in commercial and residential buildings.*" **Based on the anticipated loss of 48,000+ acres of natural lands and 8,100+ acres of farmland, please explain how Connect SoCal is superior to the baseline forecast. This is especially important in that Connect SoCal includes the environment as one of four pillars of the document.**

### Section 2.4 (California State Wildlife Action Plan (SWAP))

The most recent SWAP is from 2015, as indicated on page 6. It may be a comprehensive document, but it's outdated. New species were added in the last eight years and others are being considered for addition to the California/Federal Endangered Species List. **We suggest that SWAP information be supplemented with new data and information available from the California Department of Fish and Wildlife and/or US Fish and Wildlife Service for species, critical habitat, and other species monitoring in the SCAG region. The Program**

## **Environmental Impact Report uses much more current data. Why not this Technical Report?**

### **Section 2.5 (SCAG SCS Land Use Priorities)**

As outlined in Section 2.5.2, SCAG’s Water Resolution, states “*In October 2022, SCAG’s Regional Council adopted its Water Action Resolution (Resolution No. 22-647-3).*” The Resolution calls on SCAG to, “*identify, recommend and integrate into Connect SoCal 2024 policies and strategies to align investments in water infrastructure with housing needs and the adopted growth forecast and development pattern. Connect SoCal 2024’s water resilience regional planning policies and implementation strategies that fulfill Regional Council’s direction are included in Section 6.2.2.*” As FHBP identified in our letter on the Plan, Table 5.2 on page 184 of the Plan projects very minimal water usage decreases after the Plan is implemented. Seventy percent of water usage by a single-family home is landscaping, providing a huge opportunity to achieve greater drinking water resiliency by eliminating the use of drinking water for landscaping purposes. **Please include innovative priorities, programs, and policies for reducing the use of drinking water for residential landscaping watering.**

### **Section 2.5.3 (Pathways to 30x30 Strategy)**

FHBP is inspired by SCAG’s connection of the Connect SoCal Plan with Governor Newsom’s signed Executive Order N-82-20 that aims to combat the climate and biodiversity crises by conserving 30% of California’s land and coastal waters by 2030 (called 30x30). As staff knows, this Executive Order was recently codified in [Senate Bill 337](#) (Min-D). **Please incorporate SB 337 into the Connect SoCal Plan / Land Use & Communities Technical Report since 30x30 is codified now.**

### **Section 3.1 (Community and Land Use Patterns)**

The Report states on page 9, “*Similarly, the SCAG region has incredible diversity in its built environment and land use patterns. This diversity is reflected in how people experience their communities and how that influences overall quality of life. Complete communities are important considerations in land use planning as they are places that meet peoples’ essential needs (housing, mobility), the provision of goods and services, recreation and respite, and overall access to opportunity.*” **The notion of communities meeting people’s needs is critical and underscores many of FHBP’s overall comments and suggestions for the Plan. We agree, that’s why we continue to suggest incorporating topics such as: focusing development in existing communities, called Priority Development Areas (PDAs), to enhance services and infrastructure; ensure communities have park access via walking or riding, not simply driving; continue to discourage development in Green Region Resource Areas (GRRA) so those lands can be used to meet the 30x30 goals; and use resources wisely and continue to push for greater conservation of all resources including farmlands and water.**

The Report states, “*Despite this, the underlying historical development pattern has generally resulted in Southern California remaining very automobile dependent—with 76 percent of work commutes in 2019 coming through single-occupant vehicles.*” (pg. 19) **We suggest using more current numbers—especially in light of the new remote work / work-from-home scenarios, which account for greater work-related trip reduction.**

### Section 3.2 (Natural and Farmlands)

FHBP appreciates that this section mentions the enormous economic value that farmlands add to the community, **but the economic benefits realized by natural lands and recreation is ignored. Please consider including these benefits. See also the soon-to-be submitted Natural & Farmlands Coalition Letter for reports/resources to bolster this section.**

On page 10, the Report states, *“With abundant desert, mountain, and coastal habitats, some of the highest concentrations of native plant and animal species on the planet are found within our region.”* **It isn’t just the types of habitats and numbers of flora and fauna—it is also that these species are found nowhere else on the planet—i.e., they are endemic species. So, it isn’t just quantity, it is also about quality. With the anticipated loss of over 48,000 acres, this equates to a lot of endemic species being lost permanently from the planet. This should be addressed in the report.**

Page 11 of the Report states, *“Household and employment growth that degrades or develops vital habitats reduces the environmental services they provide us that are crucial to our regional economy, health, and overall quality of life.”* FHBP suggests weaving in a land ethic within this document, rather than making the document completely anthropocentric. The document treats the environment as separate from humanity, when in fact it is intertwined. As noted on the Aldo Leopold Foundation website, *“... the relationships between people and land are intertwined: care for people cannot be separated from care for the land.”* **The landscape, its ecosystem services, plants, animals, the web of life, and intrinsic value should be intertwined within this document and recognized for its contributions to human existence** (e.g., without pollinators, crops wouldn’t grow—without crops, humans don’t have food and wouldn’t survive).

### Section 3.3 (Climate Hazards)

As with the Plan, risks from flood events and impacts of sea level rise are identified (pg. 17), yet the issue isn’t addressed in a deeper way via policy objectives and mitigation. Sea level rise is already causing massive damage to existing infrastructure in coastal communities, while flooding is also wiping infrastructure off the map. **SCAG must include sea level rise, coastal erosion, and flooding impacts to all forms of infrastructure in policy objectives, project infrastructure maintenance costs, and mitigation measures in the Land Use and Communities Technical Report.**

Further, **the loss of actual infrastructure (powerlines, cell towers, roads, etc.) as an impact of wildfires and landslides should be captured in this section.**

**Preparation for climate hazards (such as high heat days coupled with Santa Ana winds) in the form of Public Safety Power Shutoffs should also be covered.** With these shutoffs that are implemented by electric utilities, there is potential for loss of perishable food, work time, ability to travel to and from home/work/school, stay cool, and, if you are disabled, to stay alive if dependent on life saving equipment. **These preparatory systems should be addressed as an impact to Southland residents.**

#### **Section 4.1 (Social, Economic, Natural and Built Environment Challenges)**

Many cities are adopting ordinances to cover short-term rentals because of neighborhood impacts. That said, if homes are being rented for less than 30-day stays, this is housing that could be made available to the community permanently. **The housing impacts of short-term rentals and even foreign-owned investments should be acknowledged in the document.**

This section appropriately identifies the rapidly growing unhoused population in the SCAG region, up from 53,729 in 2012 to 85,000 in 2022 (pg. 14), as a crisis. While there are a number of reasons for homelessness, affordability is a primary cause. **We encourage SCAG to be innovative with housing affordability policies. Consider going beyond building affordable housing and also focus on retrofitting the 100,000+ substandard or incomplete facilities identified in the Housing Technical Report (pg. 10), and recommend jurisdictions remove in-lieu fees for affordable housing when issuing entitlements for new developments.**

FHBP applauds the discussion on page 15 of Regional Advance Mitigation Programs (RAMP); however, the Plan doesn't specifically say it will implement a RAMP. **We recommend SCAG use its regional leadership position to assist communities, cities, counties, and/or transportation/infrastructure agencies to implement new RAMP or complement existing programs to accommodate new mitigation needs (i.e. climate impacts and vehicle miles traveled).** Further, RAMPs are a strategy identified in the [Pathways to 30x30 document](#) released by the California Natural Resources Agency, specifically Pathway #5. **We encourage SCAG to call out Connect SoCal's alignment with this statewide plan.**

#### **Section 4.3 (Resilience Shocks and Stressors)**

While sea level rise does cause flooding, it is a distinct issue. Additionally, while aging infrastructure is more prone to damage by sea level rise, the concept of aging infrastructure doesn't capture the entire picture of damage done via sea level rise. **In the table on page 18, please include "sea level rise" in the shocks column because "flooding" doesn't adequately capture both concepts. Please include damage to critical infrastructure in the stressors column because "aging infrastructure" doesn't adequately capture both concepts.**

#### **Section 5.1 (Building a Regional Growth Vision)**

On page 19, the Report states, *"The growth visioning process in Connect SoCal 2024 aims to strengthen the relationship between the region's growth vision and local implementation by instead integrating sustainability considerations before local review, then assessing the collective effect of local edits on the overall development pattern."* **How will this be reported, tracked, and analyzed?**

On the same page, Table 1 shows a sizable decrease in population growth in 2019-2050 from the population growth during 1990-2019. It also shows increases in household growth in three of the six counties in the SCAG region (pg. 20). **Please explain the incongruity between the population growth and household growth in Orange, Riverside, San Bernardino, and Ventura Counties.**

On page 23, SCAG states that the Regional Growth Vision, *"Increases household growth in Priority Development Areas (PDAs), but does not require growth to be entirely in PDAs. PDAs*



are areas within the SCAG region where future growth can be located in order to help the region reach mobility and environmental goals and support complete communities.” **FHBP supports the majority of growth in PDAs as that’s where the infrastructure, amenities, and people exist—thus reducing the greenhouse gas emissions and vehicle miles traveled.** On page 24, it is estimated that the PDAs—though only 8.4% of the region’s total land area, will accommodate 67% of the region’s household growth and 55% of its total job growth through 2050. This would mean that additional policy considerations should be offered, including “sticks.” **FHBP suggests including “carrots and sticks.” Examples of carrots might be streamlined application processing, permit cost reduction/elimination. Examples of sticks might be fees for developments proposed outside of PDAs. We also strongly encourage a buffer to be extended around all PDAs in the developed (island areas) of unincorporated areas of the SCAG region.**

**Similarly, the following statement is unclear and should contain an outline of strategies, such as particular fees, policies, tools or costs associated with disincentivizing development in GRRAs:** “Reduces, but does not preclude household growth in Green Region Resource Areas (GRRAs). GRRAs are areas where climate hazard zones, environmental sensitivities, and administrative areas (such as military bases) where growth would generally not advance SB 375 objectives (see Section 5.3).” If, as the document states in Section 5.3 (pg. 44), a goal is to “Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption, and promote resilience,” **how does losing 48,000+ and 8,100+ acres of natural and farmlands, respectively, by 2050 in any way serve to meet that goal?**

### **Section 5.2 (PDAs Guiding the Forecasted Regional Development Pattern)**

On page 24, SCAG states, “PDAs in Connect SoCal 2024 include Neighborhood Mobility Areas (NMAs), Transit Priority Areas (TPAs), Livable Corridors and Spheres of Influence (SOIs) (in unincorporated areas only)” and “PDAs are a technical tool to facilitate plan development and analysis and are used for different purposes in the Plan, such as growth visioning, performance measurement or grant applications.” As mentioned before, this language suggests there are “carrots” for developing in PDAs; however, in order to achieve greater success with guiding development in PDAs where development belongs, there must be “sticks” or fees and costs associated with developing outside of PDAs. **These policy statements are therefore only indicating compensation for good land use decisions, but failing to deter bad decisions.**

On page 25, the Report explains, “Livable Corridors” and the objective to “redevelop single-story under-performing retail with well-designed, higher density housing and employment centers.” FHBP supports redeveloping low-density city-centered retail strip-mall-type developments to be more efficient, higher density, transit oriented, walkable, and more attractive for the community. **Are there additional policy objectives that could be identified that ensure the buildings aren’t simply given a face-lift rather than a complete beneficial re-design? One policy objective could be to only provide transit improvements and transit investments if the re-design meets certain criteria and thresholds. Another policy objective could be to remove parking requirements in high quality transit areas.**

The discussion regarding Spheres of Influence (SOIs) on page 26 misses an opportunity to encourage buffers around 15-Minute Communities in the unincorporated areas in the SCAG

region. **Please use your political capital to encourage buffers around 15-Minute Communities in the developed (island areas) of unincorporated counties to reduce sprawl, support transit, protect natural and farmlands, improve quality of life, and encourage higher-density growth.**

The document states on page 26, “According to the Regional Forecasted Development Pattern, 72 percent of the region’s household growth from 2019-2050 projected to occur in unincorporated areas is estimated to occur in SOIs.” **How much of the SOI is in a PDA? It is unclear how 72% of the region’s household growth can occur in SOIs, when page 24 states 67% of the growth will occur in PDAs.** For example, the majority of SOIs in Orange County are in the foothills, mountains, and severely geographically constrained areas. **The overlap in PDAs and SOIs must be understood.**

#### **Section 5.4 (Development Outside of PDAs)**

We again reiterate our request that SCAG encourage buffers around 15-Minute Communities in the rural areas. **Please include the policy recommendation for buffers around 15-Minute Communities in the Report’s discussion on page 34.**

We believe we’ve found an error in the document. It says on page 36, 148% of jurisdictions participated, but 167 out of 197 were met with one-on-one. **How could 148% of jurisdictions have participated? Please explain.**

#### **Section 6.1 (Equitable Engagement and Decision-Making)**

The regional planning policies and implementation strategies outlined on page 39 are comprehensive and supported by data in the Plan. We believe the implementation strategies will achieve the goal stated on page 40, “The overall goal of engagement efforts should be to reflect the needs and voices of impacted communities as clearly as possible in the plans, policies, and program developed.” **FHBP requests benchmarks and timelines for these engagement tools, including development of the Equity Assessment Tool, Community Based Organization Partnering Strategy, pilot programs, and resource guide.**

#### **Section 6.2 (Climate Resilience)**

While FHBP applauds SCAG’s nod to promoting sustainable water use planning, practices, and storage on page 41, we cannot find the nexus between that desire and the projected 0.4% water savings over the life of the Plan identified on page 184 in Table 5.2 “Connect SoCal 2024 Co-Benefits.” **Please explain.**

**Again, the benefits of natural resource preservation are overlooked in this section and should be addressed.** [See the soon to be submitted Natural and Farmlands Coalition letter for a list of resources on the economic benefits of open space. As stated in that letter, “Parks not only generate jobs, but also economic activity, increase residential property values, reduce pollution, improve local tax revenues, increase well-being (thereby reducing medical costs), provide stormwater benefits by capturing precipitation, and much more. Nationally outdoor recreation generated \$1.1T in economic output, exceeding motor vehicle manufacturing and performing arts.”]

**The issue of insurance policy cost and access should be addressed for the implementation strategy within bullet 4.**

### **Section 6.2.1 (Nature-Based Solutions)**

The Reports states, *“Many of the greatest environmental challenges facing the SCAG region, such as increasingly hot temperatures, poor air-quality, and wildfire can be partially or fully addressed by incorporating natural features or processes into the built environment.”* (pg. 42) Nature-based solutions should also be incorporated into ... nature. Acquisition of natural lands, restoration of landscapes, creation of tidal wetlands, etc., are all nature-based solutions that align with Connect SoCal, but are seemingly ignored due to the anthropocentric approach to the document. We suggest reviewing the California Natural Resources Agency’s [Natural and Working Lands Climate Smart Strategy](#) for approaches to include, such as forest management, ecological connectivity, adaptive management, combating invasive species, creating climate refugia, etc.

### **Section 6.2.2 (Water Resilience)**

Continuing our above comment, given the record-breaking droughts the SCAG region is regularly experiencing, FHBP is surprised that the co-benefits of the Connect SoCal Plan for reducing water consumption is only 0.4%. The Report lists sustainable water infrastructure to be incorporated for improving water resilience. **These “sustainable water infrastructure” projects should be cost-effective, equitable, economically feasible, and environmentally sound, and should produce more savings than 0.4% over the life of the Plan.**

The Report lists four nature-based solutions on page 42, and we want to comment on bullet point three. Most drinking water usage in residential zonings is used for landscaping. Therefore it’s not just the types of plants planted, but the type of water used to support them. Drinking water should never be used on landscaping as it is a waste of this precious resource. **New permits for both residential and commercial projects should require stormwater catchment basins for landscaping purposes and best management practices for low impact development. We recommend that policy objectives be included in this section.**

### **Section 6.2.3 (Urban Greening)**

While urban trees do, as the document points out, reduce air pollution, capture stormwater, and more, urban greening requires maintenance. **The appropriate management of urban trees and vegetation should be acknowledged here.**

### **Section 6.3 (Natural and Farmlands Preservation)**

On page 43, the introductory sentence states, *“Preserving the region’s natural and farmlands will ensure that future generations will be able to enjoy Southern California’s unique landscapes as we do, and benefit from the essential resources that natural lands provide.”* Again, this anthropocentric view neglects the immense biodiversity found in the California Floristic Province and endemic species found here. These species make Southern California a unique landscape—above and beside the values they bring to the residents. **These intrinsic values should be acknowledged.**



On page 57, the Connect SoCal Plan identifies that 40,000 acres of farmland and 50,000 acres of natural lands were lost in the last decade. The Report says on page 44,

*“For natural lands, 48,590 acres are anticipated to be converted to urban uses by 2050 from existing conditions. This represents 617 acres more than the Trend/Baseline and is consistent with jurisdictional feedback on locally anticipated growth. With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 18,032 acres of degraded habitat - 1,202 acres more than the Trend/Baseline. Some areas are improved, however, as Connect SoCal will result in 1,891 acres of improved habitat - 666 acres more than the Trend/Baseline. For agricultural areas, specifically, implementation of Connect SoCal will result in conversion of 8,156 acres to urban uses - a loss of an additional 1,464 acres of farmland over the Trend/Baseline. There are economic impacts due to this loss of farmland, where agricultural production value is anticipated to decline by roughly \$9 million through [the] year 2050 compared to the Trend/Baseline. With this loss of both natural and farmlands, groundwater recharge is anticipated to decline by 129,326 acre-feet - 24,862 more acre-feet than the Trend/Baseline scenario.”*

**The regional planning policies and implementation strategies listed on page 45 of the Report are apparently not designed to work, based on the massive loss of natural and farmlands identified on the previous page. Please explain how this loss can possibly help to reach environmental, sustainability, and natural lands/farmland goals as outlined throughout the entire Connect SoCal document and this Technical Report? Because of the massive loss of natural and farmlands projected, in addition to other sustainability goals not met such as water conservation, stronger mitigation measures are needed to offset the impacts. At this point, the impacts are significant and unavoidable in the Program Environmental Impact Report/Statement.**

Page 45 of the Report goes on to say, *“Connect SoCal envisions Regional Advance Mitigation as a key pathway for natural and agricultural lands preservation, which is included as a Regional Strategic Investment that can support conservation as a means of mitigating the environmental impacts of transportation investments.”* SCAG is positioned as a leader and regional convener across many jurisdictions and agencies. This position shouldn't be ignored. **As asked in our letter on the Plan and in this letter on page 2, does this mean the RAMP will be implemented—especially in light of the fact that the Plan identifies \$1 billion available for RAMP investments? If no RAMP is actually created, how will this investment figure be reached? What is the timeline for implementation of a RAMP?**

Page 45 also states, *“In addition, SCAG’s future work will involve conducting a study to examine the economic and fiscal benefits of natural and agricultural lands preservation to support local jurisdictions’ decision making by identifying the tradeoffs of conversion of natural and agricultural lands to urban uses, including loss of groundwater recharge areas and climate pollution sequestration.”* **Is this a mitigation measure? If not, why not? How is this included in Connect SoCal?**

#### **Section 6.4.1 (Elements of Complete Communities)**

Page 47 lists Affordable Housing Authorities (AHA) as a tool that can be used to reach infrastructure and housing goals. **Local Land Trusts are another option.** See the [Newport](#)

[Beach Housing Trust](#) recently established to create affordable housing by linking public and private dollars.

### **Section 6.4.3 (15-Minute Communities Policies)**

**Urban growth boundaries, density transfers, transfer taxes (see [Martis Fund](#)), and transfers of development rights should be added to the list of options to support the realization of complete communities. (See pg. 46)**

As the Report clearly defines on page 48, “*A 15-Minute Community is one in which people can access most or all their daily necessities, services, and amenities within a 15 minute walk, bike, or roll (e.g., using a mobility device) or as places that result in fewer and shorter trips because of the proximity of complementary land uses. Because key destinations are located closer together, the length or number of trips that people make is reduced.*” **In order to ensure these objectives are met, SCAG must list as an attribute that each 15-Minute Community has a buffer to encourage higher density development. Please add buffers in the bulleted list of positive attributes on page 48. Please also include buffers as regional planning policy number four for 15-Minute Communities on page 49. Preventing sprawl can be an effective policy tool to assist in meeting higher density land use objectives in developed (island areas) of unincorporated communities.**

### **Section 7.4 Summary of Plan Impacts and Benefits**

On page 56, land consumption of greenfield land for the baseline is 78 square miles and is listed as 41 square miles under the Connect SoCal Plan. This doesn’t resonate with the data provided on page 44 of the Report. **Please explain.**

Page 56 compares the baseline and Connect SoCal Plan’s cumulative fiscal impacts to infrastructure capital. **Does the figure of \$23.8 billion under Connect SoCal include sea level rise infrastructure impacts?**

The chart on page 57 compares the baseline and the Plan’s household costs. Only transportation and utility costs are included. **Given that home insurance rates have skyrocketed in California in the last five years and now represent a larger piece of the household expenditures’ pie, a home insurance line item should be included.**

Respiratory related illness rates are not the sole indicator of community health, as the Public Health line item in the chart on page 57 seems to indicate. **The Public Health line item should include numerous other health indicators such as life-longevity, obesity rates, etc. These data are easily obtained via sources such as [CalEnviroScreen](#).**

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

Sincerely,



Michael Wellborn  
President



December 26, 2023

Submitted via email to: [ConnectSoCal@scag.ca.gov](mailto:ConnectSoCal@scag.ca.gov) and [ConnectSoCalPEIR@scag.ca.gov](mailto:ConnectSoCalPEIR@scag.ca.gov)

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

RE: Comments on the 2024 Draft Connect SoCal

Dear Connect SoCal Team:

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

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

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

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

FHBP has the following general questions:

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

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

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

### **EXECUTIVE SUMMARY**

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

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

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

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

## ***CHAPTER 2: OUR REGION TODAY***

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

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

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

## ***SECTION 2.2 NEW AND EVOLVING TRENDS***

### ***Rethinking the Workplace***

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

### ***Climate Change***

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

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

### ***Resilience***

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



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

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

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

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

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

## ***SECTION 2.3 REGIONAL CHALLENGES***

### ***Key Community Challenges***

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

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

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

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

### ***Key Economic Challenges***

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

## ***SECTION 3: THE PLAN***

### ***SECTION 3.1 PURPOSE AND PLAN STRUCTURE***

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

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

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



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

### **SECTION 3.2: THE HEART OF THE PLAN**

#### **Fix-It-First Policy**

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

#### **Priority Development Areas (PDAs)**

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

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

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

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

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

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

### *Green Region / Resource Areas (GRRAs)*

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

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

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

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

### *Regional Strategic Investments*

#### *Natural and Agricultural Lands Preservation*

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

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

### ***SECTION 3.3: REGIONAL PLANNING POLICIES***

#### ***Mobility***

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

#### ***Communities***

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

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

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

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

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

### ***Environment***

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

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

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

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

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

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

### ***Section 3.4: Plan Fulfillment***

#### ***Strategies***

##### *System Preservation and Resilience*

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

##### *Complete Streets*

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

##### *Transportation Systems Management*

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

##### *Funding the System / User Pricing*

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

##### *Priority Development Areas*

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

##### *15-Minute Communities*

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



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

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

#### *Sustainable Development*

On page 131, SCAG is listed as the lead to “*Monitor and pursue funding opportunities that can foster sustainable and equitable land use and development across the SCAG region. Explore the feasibility of creating a pilot grant program to support local planning and/or implementation.*”

**We hope that existing research and implementation measures in other jurisdictions are used as examples so SCAG isn’t reinventing the wheel. Also, what sustainable development practices is SCAG focused on?**

#### ***Section 5.1 Performance Outcomes***

##### *Performance Monitoring*

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

##### *Plan Performance*

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

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

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

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

## Section 5.2: Regional Benefits

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

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

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

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

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

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

Sincerely,



Michael Wellborn  
President

RECEIVED JAN 17 2024



January 12, 2024

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

Re: Aquabella Specific Plan Amendment Project; Notice of Preparation; City of Moreno Valley, County of Riverside

To SCAG:

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.

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.

Best regards,

**Andrew Daymude**  
Vice President of Community Development  
Highland Fairview







**Community Development Department  
Planning Division**  
14177 Frederick Street  
P.O. Box 88005  
Moreno Valley CA 92552  
Telephone: (951) 413-3206  
Fax: (951) 413-3210

**Date: October 25, 2023**

**TO: Office of Planning and Research, Responsible Agencies, Trustee Agencies, Organizations, and Interested Parties**

**SUBJECT: Recirculated Notice of Preparation of a Draft Subsequent Environmental Impact Report for the Aquabella Specific Plan Amendment Project (SCH# 2023100145)**

**LEAD AGENCY:**

City of Moreno Valley  
Community Development Department  
14177 Frederick Street  
P.O. Box 88005  
Moreno Valley CA 92552-0805  
Telephone: (951) 413-3206  
Contact: Oliver Mujica, Contract Planner  
Email: [planningnotices@moval.org](mailto:planningnotices@moval.org)

**EIR CONSULTANT:**

Dudek  
605 Third Street  
Encinitas, CA 92024  
(760) 479-4299  
Contact: Carey Fernandes  
Email: [cfernandes@dudek.com](mailto:cfernandes@dudek.com)

The City of Moreno Valley, as lead agency under the California Environmental Quality Act (CEQA), will prepare a Draft Subsequent Environmental Impact Report (DSEIR) for the Aquabella Specific Plan Amendment Project (Project) in compliance with the CEQA (Public Resources Code § 21000, et seq.) and the State CEQA Guidelines (California Code of Regulations, title 14, § 15000, et seq. ["CEQA Guidelines"]). This will be a DSEIR to the Moreno Valley Field Station Specific Plan EIR (SCH No. 1993112076). In accordance with Section 15082 of the CEQA Guidelines, the City has issued this Recirculated Notice of Preparation (NOP) to provide responsible agencies, trustee agencies, and other interested parties with information describing the proposed Project and its potential environmental effects. A copy of the Recirculated NOP is also located at the City of Moreno Valley and available on the City's website at <http://www.moreno-valley.ca.us/cdd/documents/about-projects.html>.

Due to time limits mandated by state law, your response to this Recirculated NOP must be submitted at the earliest possible date, but no later than 30 days after receipt of this notice or November 27, 2023.

Please send your comments to Oliver Mujica, Contract Planner, at the City of Moreno Valley address listed above. Please include your name, phone number, and address of a contact person in your response. If your agency or organization will be a responsible or trustee agency for this Project, please so indicate.

**PROJECT APPLICANT: T/Cal Realty II, LLC**

**STATE CLEARINGHOUSE NO.: 2023100145**

**PROJECT TITLE: Aquabella Specific Plan Amendment**

October 2023

## **Recirculated Notice of Preparation and Public Scoping Meeting Notice Aquabella Specific Plan Amendment**

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**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.**)

**PROJECT SETTING:** The Project site consists of the area designated Aquabella Specific Plan (Specific Plan No. 218), together with one small residential parcel located along the eastern boundary of the site, APNs: 486-280-060; 486-280-056; 486-280-057; 486-300-012 and 013; 486-310-014; 486-310-035; 486-320-009 through 012; 486-320-006. The Project site is located east of I-215, south of SR-60, and north of Lake Perris on Cactus Avenue and Nason Street, east of Laselle Street, north of Iris Avenue, west of Oliver Street, and south of Brodiaea Street. The Project site is in Sections 15, 16, 21, and 22 of Township 3 South, Range 3 West on the USGS Sunnymead 7.5 Minute Quadrangle. (See **Figure 1, Regional Location Map.**)

The 2040 General Plan Land Use and Community Character Element designates the central Project site as Downtown Center (DC), Aquabella Specific Plan. One additional parcel plus the adjacent road right-of-way (totaling approximately 10 acres) is designated Residential R5 under the 2040 General Plan, which allows for single-family detached housing of 5 units/acre. The Zoning Map designates the central Project site as Downtown Center-Specific Plan (DC-SP), SP 218, indicating its zoning is Downtown Center and SP 218. The additional parcel is zoned as Residential R5 District. (See **Figure 2, City of Moreno Valley - Existing Land Use**, and **Figure 3, City of Moreno Valley - Existing Zoning.**)

Master-planned, mixed-use residential development has long been the intended use of the Project site. Approved in 1999, the Field Station Specific Plan (Specific Plan No. 218) envisioned development of 2,922 single- and multi-family homes on approximately 399 acres, a 148.7-acre golf course, 51 acres of parks, 24 acres of retail/commercial, and 80 acres of school and recreational areas, including a high school, middle school, two elementary schools, ball fields, and active play areas. Other proposed improvements covered traffic circulation, flood control, and water and sewer services. The Field Station Specific Plan was the subject of full environmental review and analysis under CEQA in an EIR prepared for the Field Station Project and a Supplemental EIR (SCH. No. 1993112076).

In 2005, the first Aquabella Specific Plan Amendment proposed to modify the approved plan to designate 2,702 of the 2,922 homes as age-restricted for seniors, to update commercial uses, to eliminate the elementary and middle schools, and to replace the golf course with a 40-acre lake complex, clubhouse facilities, trail and bicycle paths, and other amenities. The Aquabella Specific Plan was evaluated in an Addendum prepared pursuant to CEQA.

Significant portions of these prior approvals have been implemented in the intervening years. Approximately 70 percent of the site has been graded or developed, including the approved lake complex. The required permits to address impacts to onsite drainages have been obtained and regional drainage and flood control improvements have been completed, including a concrete-lined channel. Following the construction of the concrete-lined channel, an earthen bypass channel was built parallel to the channel to the south and planted with native vegetation leading to a bio-basin to meet the federal and state agency water quality requirements. Onsite backbone infrastructure and transportation facilities have been installed, including the extension of Nason Street between Cactus Avenue and Iris Avenue, and improvements to Cactus Avenue. Two deep groundwater wells have been drilled and tested, providing a supplementary water source that would be used in implementing and maintaining the Project. The 50-acre Vista del Lago High School has been built. In addition, the first residential phase of development, a 220-unit multi-



## **Recirculated Notice of Preparation and Public Scoping Meeting Notice Aquabella Specific Plan Amendment**

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family residential complex situated on the Project site's northwest corner has been completed. (See **Figure 4, Prior Implementation and Revised Footprint.**)

The Project site's surrounding area is urbanized with a variety of residential densities, education, medical, and other uses. The Riverside University Health System Medical Center, a public teaching hospital, is along a portion of the Project site's northern boundary, and the Kaiser Permanente Hospital and medical complex is along a portion of the site's southern boundary. Residential uses surround the Project site to the west, northwest, northeast, south, and east, along with several neighborhood parks. Landmark Middle School and the Rancho Del Sol golf club are located east of the Project site. The Lake Perris State Recreation Area is approximately one-half mile to the south of the Project site. The Moreno Valley College is approximately 1 mile south of the Project site, and the World Logistics Center logistics campus is located approximately 2.5 miles northeast of the Project site (see Figures 1 and 2).

The 2040 General Plan Land Use Element designates the area adjacent to the Project site to the north as Downtown Center (DC) and Residential 5 (R5); to the east as DC, R5, Residential 2 (R2), Public, and Open Space; to the south as Residential 10 (R10), R5, Public, and Open Space; and to the west as R5 and R10. Figure 2 depicts the urbanized land uses surrounding the Project site.

**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.

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.

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.**)

### **ENVIRONMENTAL ISSUES TO BE EVALUATED IN THE DSEIR**

The City of Moreno Valley has determined that a DSEIR is required to satisfy environmental review for the proposed project. The DSEIR will address the changes to the Project, its circumstances, and significant new information that has occurred since the City previously certified a prior EIR, supplemental EIR, and addendum for development of the site. (CEQA Guidelines § 15162, 15163.). Therefore, as allowed under CEQA Guidelines Section 15060(d), no Initial Study will be prepared. The DSEIR will focus on the potentially significant effects of the Project, discuss any effects found not to be significant, and assess the direct, indirect, and

## **Recirculated Notice of Preparation and Public Scoping Meeting Notice Aquabella Specific Plan Amendment**

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cumulative impacts, as well as growth-inducing effects. The DSEIR will include an evaluation of the following environmental issues:

- Aesthetics
- Agriculture and forestry resources
- Air quality
- Biological resources
- Cultural resources
- Energy
- Geology and soils
- Greenhouse gas emissions
- Hazards and hazardous materials
- Hydrology/water quality
- Land use and planning
- Mineral resources
- Noise
- Population/housing
- Public services
- Recreation
- Transportation
- Tribal cultural resources
- Utilities and service systems
- Wildfire

The SEIR will assess the effects of the Project on the environment, identify potentially significant impacts, identify feasible mitigation measures to reduce or eliminate potentially significant environmental impacts, and discuss potentially feasible alternatives to the Project that may accomplish basic objectives while lessening or eliminating any potentially significant Project related impacts. A mitigation monitoring program will also be developed as required by Section 15150 of the CEQA Guidelines.


This Recirculated NOP is subject to a minimum 30-day public review period per Public Resources Code Section 21080.4 and CEQA Guidelines Section 15082. During the public review period, public agencies, interested organizations, and individuals have the opportunity to comment on the proposed Project and identify those environmental issues that have the potential to be affected by the Project and should be addressed further by the City of Moreno Valley in the DSEIR.

### **SCOPING MEETING**

In accordance with Section 21083.9(a)(2) of the Public Resources Code and CEQA Guidelines Section 15082(c), the City will hold a public scoping meeting, where agencies, organizations, and members of the public will receive a brief presentation of the Project and the CEQA process. The scoping meeting will be held at City of Moreno Valley, City Hall Council Chamber, 14177 Frederick Street, Moreno Valley, CA 92553 in person on November 15, 2023, at 6:00 p.m.

Please contact the Community Development Department, Planning Division at (951) 413-3206 if you have any questions.

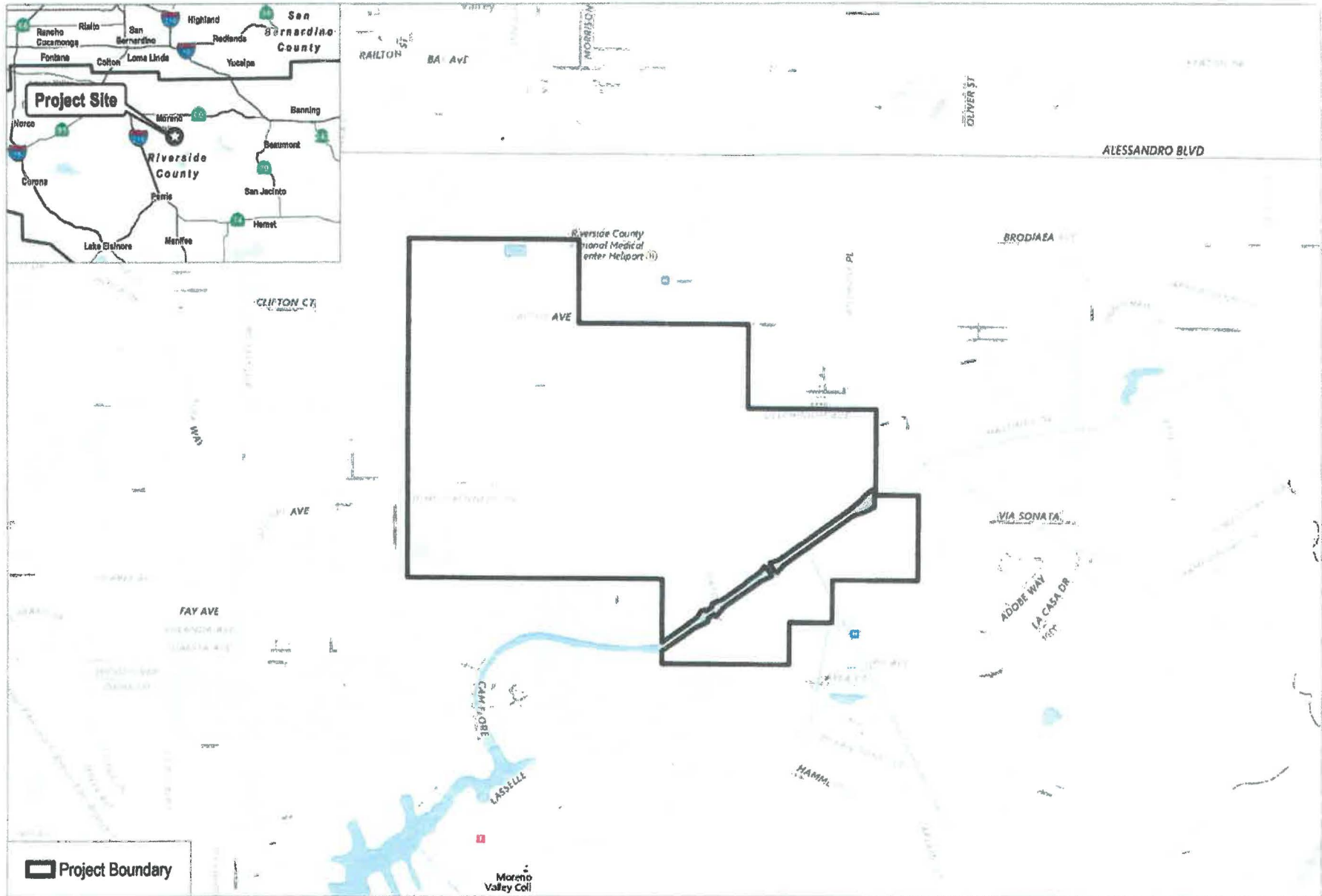
Sincerely,

  
Oliver Mojica  
Contract Planner

### **Attachments:**

- Figure 1 -- Project Location Map
- Figure 2 -- City of Moreno Valley - Existing Land Use
- Figure 3 -- City of Moreno Valley - Existing Zoning
- Figure 4 -- Prior Implementation and Revised Footprint
- Figure 5 -- Proposed Project Land Use Plan

October 2023



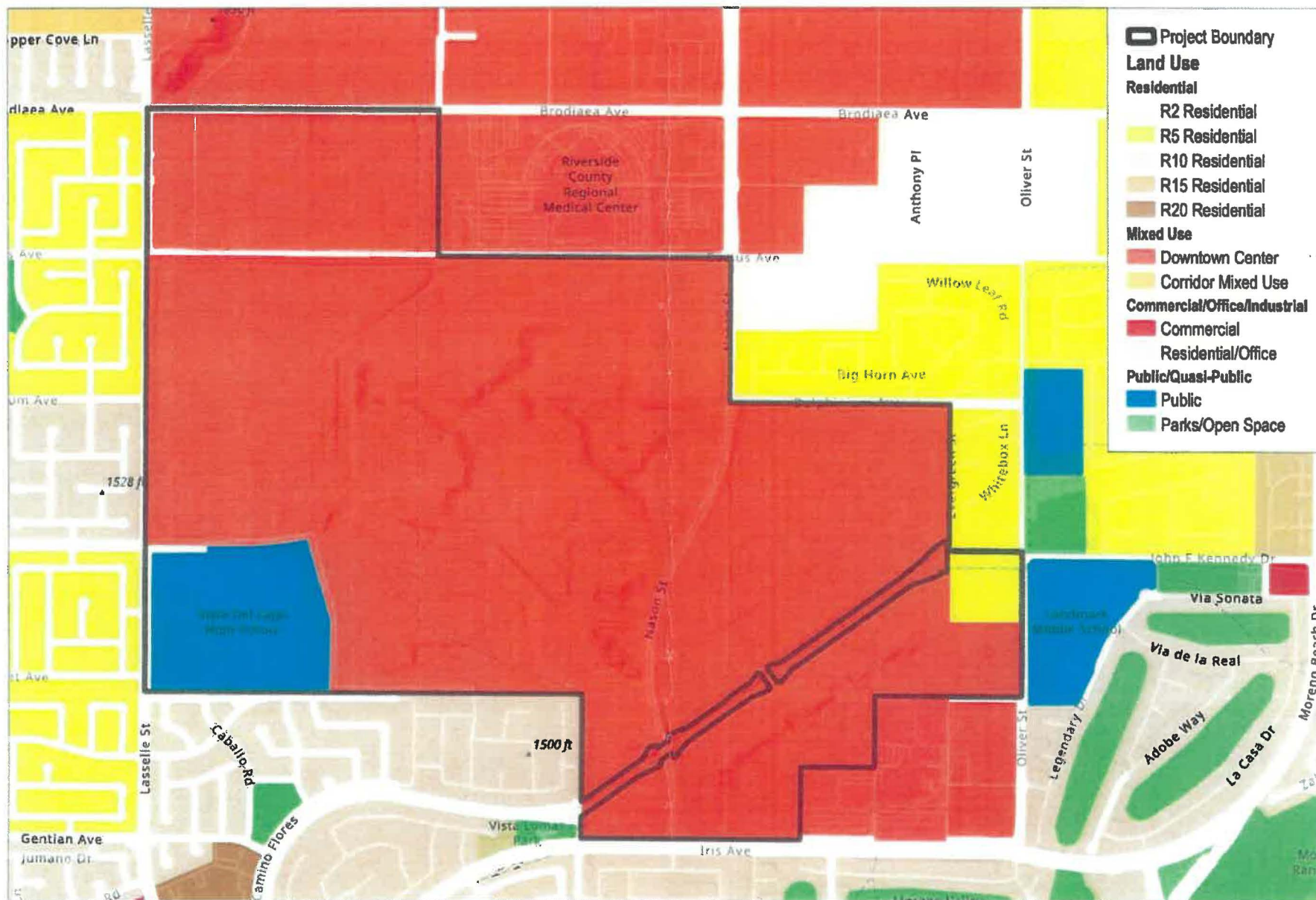
SOURCE: USGS National Map 2023  
Sunnymead Quadrangle - Township 3S Range 3W Sections 15, 16, 21, 22

**DUDEK**  0 500 1,000 Feet

**FIGURE 1**  
**Project Location**

Aquabella Specific Plan Amendment Project

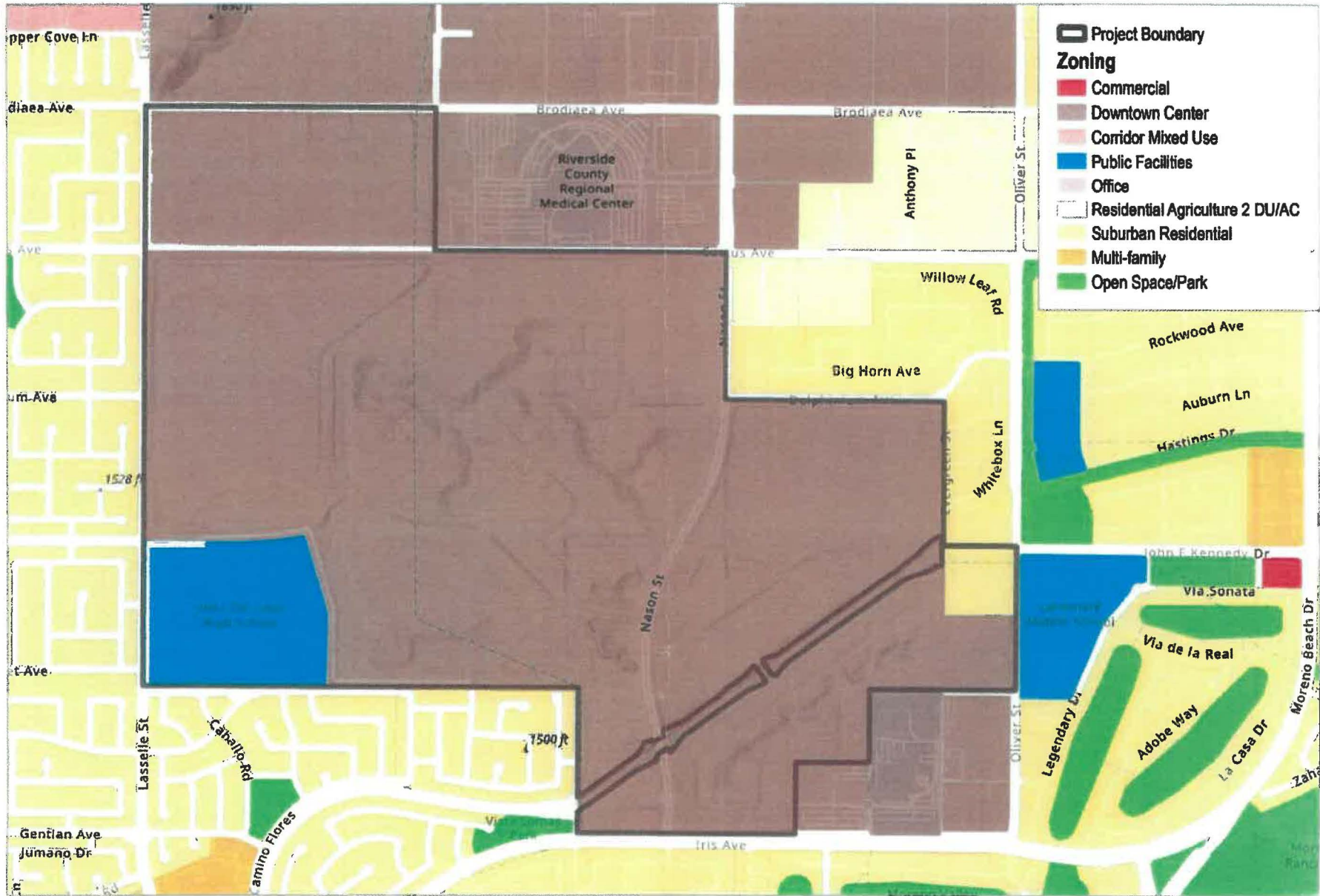




SOURCE: World Topographic Map 2023; Forma 2023



**FIGURE 2**  
**Existing Land Use**  
 Aquabella Specific Plan Amendment Project



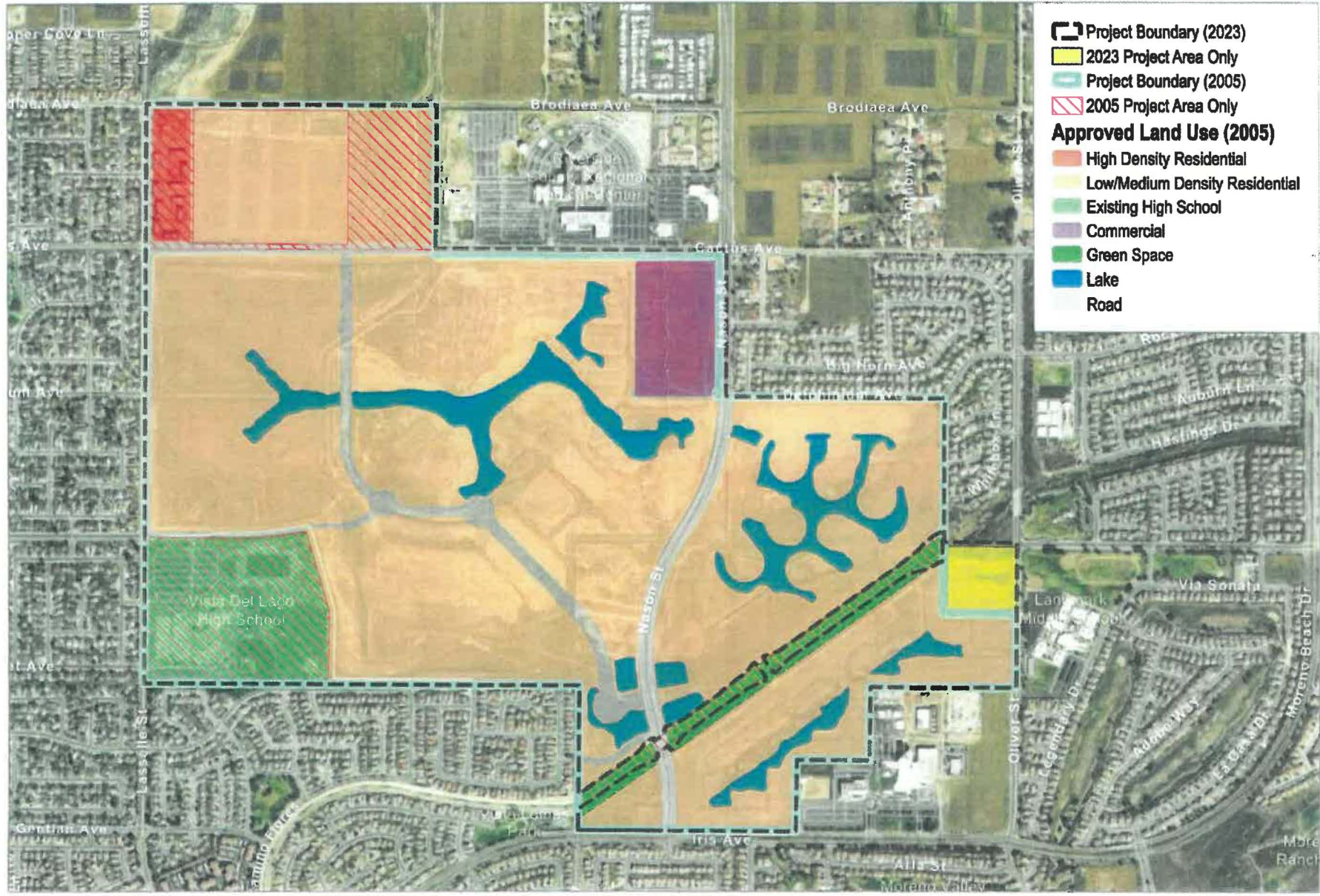
SOURCE: World Topographic Map 2023; Forma 2023

**FIGURE 3**  
**Existing Zoning**

Aquabella Specific Plan Amendment Project







SOURCE: Maxar 2022

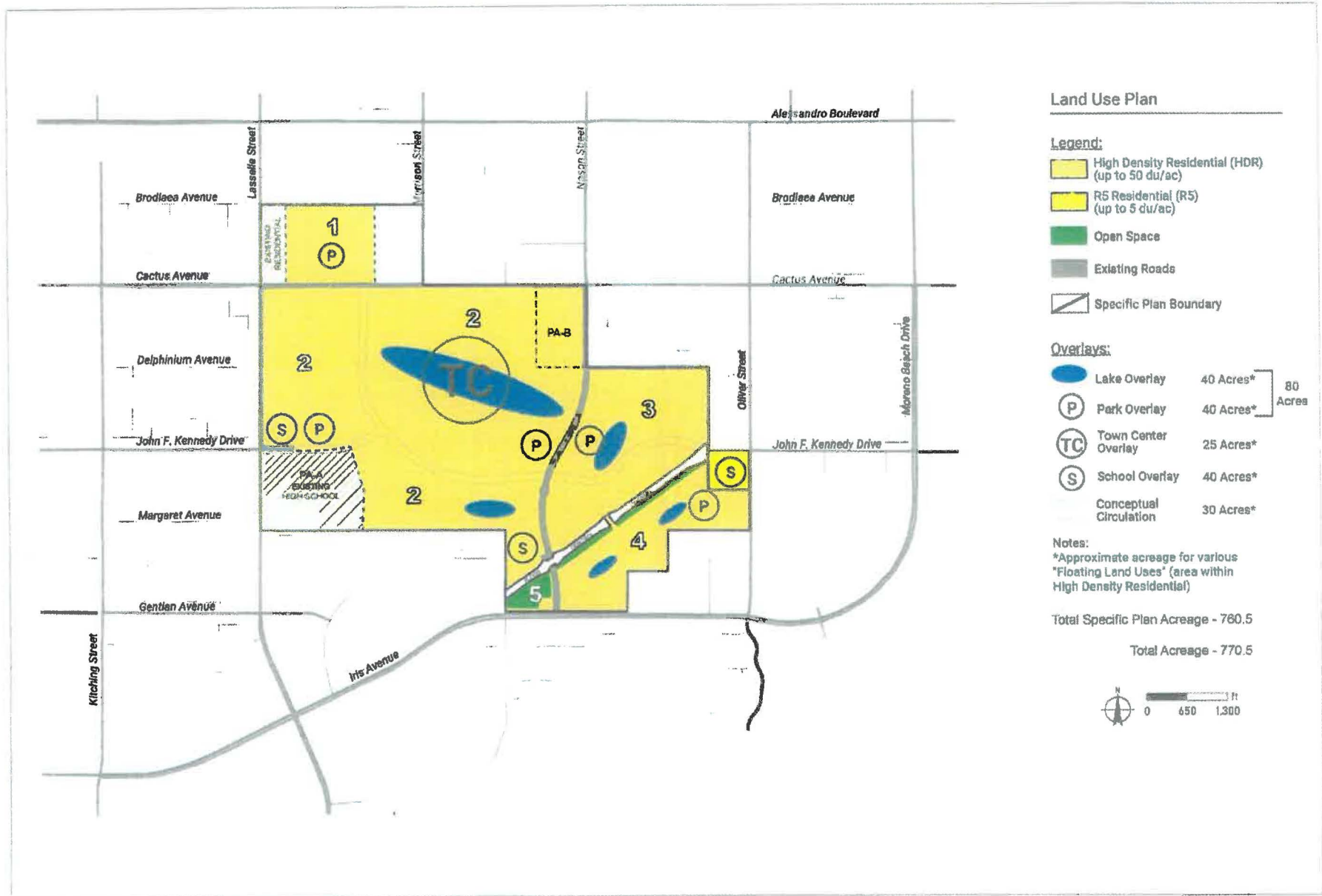
**FIGURE 4**

**Specific Plan Implementation**

Aquabella Specific Plan Amendment Project

**DUDEK**  0 500 1,000 Feet





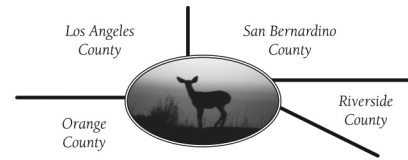
SOURCE: Forma 2023



**FIGURE 5**  
**Proposed Project Land Use Plan**  
Aquabella Specific Plan Amendment Project

# H i l l s   F o r   E v e r y o n e

*Southern California comes  
together at the Puente-Chino Hills*



January 12, 2024

Submitted via email to: [ConnectSoCal@scag.ca.gov](mailto:ConnectSoCal@scag.ca.gov) and  
[ConnectSoCalPEIR@scag.ca.gov](mailto:ConnectSoCalPEIR@scag.ca.gov)

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

RE: Comments on the 2024 Draft Connect SoCal, the Land Use and  
Communities Technical Report, the Project List, and the Program Environmental  
Impact Report and Statement

Dear Connect SoCal Team:

Hills For Everyone (HFE) submits these comments on the 2024 Draft Regional  
Transportation Plan and Sustainable Communities Strategy (collectively Connect  
SoCal) and its environmental document, the Program Environmental Impact  
Report.

By way of background, HFE is a 47-year-old non-profit organization that  
established Chino Hills State Park (CHSP) and is still working to conserve the  
remaining natural lands in the Puente-Chino Hills Wildlife Corridor at the juncture  
of Los Angeles, Orange, San Bernardino, and Riverside Counties.

Our comments on the 2024 Draft Connect SoCal (the Plan), the Land Use and  
Communities Technical Report, the Project List, and the Program Environmental  
Impact Report and Statement (PEIR) are sectioned below by document, then  
chapter, page, and the referenced material (often with a quote), followed by  
our comments.



rainstorms, coastal flooding from sea level rise, and urban heat island effects from unusually high temperatures.”

**Comment:** The document fails to make the connection between climate change “challenges and pressures” and tangible impacts to actual Southland residents. Impacts aren’t just to houses or roads, but people too. Only one sentence was included that connects people to high heat days. Looking at just wildfire: People endure evacuation, loss of time at work, immediate need for supplemental housing in case of housing loss, lack of basic needs following a fire (i.e., clothes, medication, food), and lack of communication ability (due to the loss of power, phone service or cell towers). Further, the lack of adequate evacuation routes, lack of redundant water system, coupled with power outages during high heat/high wind days—all have detrimental effects on people, their stress levels, and create trauma experiences. These climate-related events may happen in the region, but people live in the region and experience these impacts. The “safety of neighborhoods” isn’t enough, thus we recommend the safety of people be considered. The connection between the impacts and people should be drawn more substantially.

**Page:** 36

**Reference:** “Resilience is defined as the capacity of the SCAG region’s built, social, economic, and natural systems to anticipate and effectively respond to changing conditions, acute shocks and chronic stressors by creating multiple opportunities for a sustainable, thriving and equitable future.”

**Comment:** The connection between cause and effect hasn’t been clearly defined. Again, using wildfires as an example: wildfires burn habitat, then when it rains, this typically causes a secondary impact of mudslides and debris flows to the same neighborhood impacted by the original shock. Further, a shock can create to a chronic stressor. And, improving resilience means challenging outdated thinking and planning strategies, and using new and updated science and tools (like Wildfire Modeling). We urge SCAG to make the connection between cause and effect.

---

**Chapter:** 3 - The Plan

**Page:** 36

**Reference:** “Shocks are sudden and acute events that threaten immediate safety and well-being, such as earthquakes and wildfires. Stressors are chronic challenges that weaken built, social, economic and natural systems, including persistent air-quality issues or transportation system disrepair.”

**Comment:** Some non-profits, neighborhoods, and cities/counties are planning for shocks and stressors right now. For example, the Carbon Canyon Fire Safe Council developed materials for [evacuation routes](#) for every neighborhood in the small enclaves of Olinda Village and Sleepy Hollow, in partnership with the

City of Chino Hills and Chino Valley Independent Fire Authority. SCAG can and should develop pilot programs and policies that improve public safety by addressing shocks and stressors like the strategies mentioned here.

**Page:** 103

**Reference:** "SCAG's approach of de-emphasizing growth in areas with the highest number of convergences is sensitive to market considerations. Further, the preservation and restoration of Green Region Resources Areas (GRRAs) can reduce risks from climate change and promote future growth."

**Comment:** We support SCAG's goal to prioritize 15-minute cities and avoid development in the GRRAs. However, it should be clarified as to why the Land Use and Communities Technical Report anticipates a loss of 48,000+ acres of natural lands and 8,100+ acres of farmland, if as Connect SoCal states, reducing the development potential on natural and farmlands is so important. The connection isn't being made about protecting GRRAs and this anticipated massive loss of undeveloped lands. This needs more clarity and clearly improved mitigation measures to reduce the impacts.

**Page:** 103-104

**Reference:** GRRAs categories: Flood Areas, Coastal Inundation (Sea Level Rise), Wildfire Risk, Open Space and Parks, Endangered Species and Plants, Sensitive Habitats, Sensitive Habitat Areas, Natural Community and Habitat Conservation Plans, Tribal Lands, Military Installations, and Farmlands.

**Comment:** We strongly feel that based on the topographic, tectonic, history of liquefaction, and general land movement that "Unstable Landforms" is missing from the list of topic areas. Landslides are already a problem along the Coast as they relate to transportation infrastructure like rail lines and this is exacerbated by climate change. For example, the Orange County Transportation Authority has issued alerts related to the South Coast Rail emergency (See the [OCTA Press Release](#) from August 2023). The Authority has had to shut down service to San Diego County due to slope failures. That said, inland areas also face landslide issues. Some of these are exacerbated by the combination of rains and wildfire, but sometimes not. The SCAG region should include not only slope failures, but draw the connection to loss of life, property, and all forms of infrastructure. (See [La Conchita Landslide PowerPoint](#) [Ventura County], [Bluebird Canyon Landslide](#) [Orange County], and the [U.S. Geological Survey's PDF on Landslides](#) [Southern California].)

**Page:** 104

**Reference:** Open Space and Parks

**Comment:** HFE supports use of the California Protected Areas Database and the California Conservation Easement Database.

**Page:** 104

**Reference:** Endangered Species and Plants

**Comment:** This reads as though plants are not species. We suggest changing the category header to read: Endangered Flora and Fauna or simply calling it Sensitive, Threatened or Endangered Species.

**Page:** 107

**Reference:** "Natural and Agricultural Land Preservation: Preserving natural and agricultural lands can strengthen our communities, protect our air, water and food, protect and enhance biodiversity, and capture greenhouse gases instead of allowing them to concentrate in the atmosphere."

**Comment:** We appreciate that natural lands and agricultural lands are identified as having these local and regional benefits. We are concerned that with only 1,891 acres projected for improvement, this number doesn't meet the policy objective. Further, the mitigation measures in the PEIR also do not support this stated goal of natural and agricultural land preservation especially considering the PEIR notes the loss of these lands is "significant and unavoidable."

**Page:** 109

**Reference:** A footnote states that the Regional Advance Mitigation Programs or RAMP was "previously a mitigation measure in the Connect SoCal 2020 PEIR (SMM BIO-2). In this cycle, the RAMP has been elevated to a plan feature, which reduces impacts."

**Comment:** The PEIR indicates plan features "may reduce impacts" (pg. 3-3 and 3-8). In reality, RAMP actually does reduce impacts, it also delivers projects faster, under budget, with streamlined permitting, using less staff time, more wisely using taxpayer dollars, encouraging collaborations among agencies, natural resource/permitting entities, and the conservation community, and with a stronger investment in landscape level conservation outcomes. See the [OCTA Environmental Mitigation Program](#), which has preserved 1,300 acres and restored 350 acres and the [Western Riverside Regional Conservation Authority](#), which includes a 500,000 acre habitat reserve. This is why we remain concerned about the lack of habitat improvements under Connect SoCal. The 1,891 acres identified as "improved" pales in comparison to the successes found elsewhere—with agencies that have deployed a RAMP. SCAG has the adopted policy framework, it should now be used instead of sitting on a shelf gathering dust.

**Page:** 119

**Reference:** The document states "encourage the protection and restoration of wildlife corridors."

**Comment:** We support this in concept, but considering SCAG has a considerable role with regional transportation projects in Connect SoCal, SCAG



should be more than “encouraging” wildlife corridors. What exact steps will be taken to protect and restore wildlife corridors? How will the needs of wildlife corridor protection be prioritized? How will it be funded? Can wildlife corridors be identified? Can funding be secured to protect or enhance the impacted corridors?

**Page:** 119

**Reference:** Policy 62 “Encourage the protection and restoration of natural habitat and wildlife corridors.” [REDACTED]

**Comment:** We support this policy, but don't understand how it will be implemented and tracked. This should be clarified.

**Page:** 178 and 181

**Reference:** Rural Land Consumption (also called Greenfields) is anticipated to be reduced 48% from the baseline.

**Comment:** How is 48% of land consumption being reduced if only 1,891 acres end up improved in a 25-year plan. The numbers don't add up.

**Section:** Glossary

**Page:** 211

**Reference:** NIMBY

**Comment:** This term is defined in the Glossary, but isn't used in the document. Further, often times residents that simply engage on community issues are attacked for speaking out are called NIMBYs. This is a derogatory word used to limit public participation and negate/ignore comments made by those that engage in the public process. It focuses on the name calling instead of the substance of the comment. It should be removed from the Glossary.

## LAND USE AND COMMUNITIES TECHNICAL REPORT

**Section:** 2.5.3 – Pathways to 30x30 Strategy

**Page:** 7

**Reference:** This section describes the goal to protect 30% of California's lands and waters by 2030.

**Comment:** The link should be made that Pathway #5 is Advance Mitigation under the [Pathways to 30x30 document](#). In short, a policy framework that SCAG has adopted, can help California achieve 30x30. Yet, the Plan falls short because RAMP isn't implemented in this RTP/SCS, nor is active conservation a mitigation measure. This should change.

**Section:** 3.3 – Climate Hazards**Page:** 13**Reference:** “Economic costs from wildfires include resources involved in fighting the fires, damage to property, health care bills, costs of disrupted business, lost tax revenue, and decreased property values, and are estimated to sum to \$10 billion dollars in 2020.”**Comment:** There is no mention of the human toll due to wildfires, the trauma, the individual financial burden, the stress, etc. Further, as additional fires occur, more insurance issues will be faced by homeowners that live in GRRA, which have a higher wildfire risk potential than other areas. There is no mention of this skyrocketing homeowner cost and how it actually impacts home production if the builder and future homeowners can't secure wildfire coverage (which leads to not being able to secure a home loan).

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**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?

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**Section:** 5.1 – Building a Regional Growth Vision**Page:** 23**Reference:** Bullets 1 and 2**Comment:** HFE supports growth in Priority Development Areas and the reduction of growth in GRRA.**Section:** 5.3 Green Region Resource Areas Guiding The Forecasted Regional Development Pattern**Page:** 28**Reference:** Implementation Strategies**Comment:** We support the implementation strategies to create protected natural lands, secure wildlife corridors, and fund pilot programs. We just don't understand why there is so little actually protected under the Plan, if these are the implementing strategies. More needs to be done to offset the significant loss of agricultural and natural land across the region, such as expanding partnerships, coordinating with state conservancies and local land trusts to implement the strategies that also align with 30x30 strategies, and collaborating on funding this work across the public/private sector.



**Page:** 30

**Reference:** Flammable “wildfire” vegetation references and Wildland Urban Intermix zone

**Comment:** We encourage SCAG to use already adopted and recognized terms. For example: Wildland Urban Interface, which is defined by the [US Fire Administration](#) as: “the zone of transition between unoccupied land and human development.” Further, while wildlands do burn, wildlands burn at a lower BTU (British Thermal Unit) than a home. US Geological Survey Researcher Jon Keeley notes: “houses burn houses down.” (See [The Best Wildfire Solutions We Are Not Using](#))

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**Section:** 6.2 Climate Resilience

**Page:** 40

**Reference:** “One of the primary ways that SCAG supports local agencies and stakeholders in these efforts is through assisting with local climate adaptation planning. Climate adaptation planning allows communities to better understand the specific local impacts of climate change they can expect and what the community’s vulnerabilities are so that they can establish and implement strategies to proactively address them.”

**Comment:** We encourage SCAG to add implementing or mitigation measures that proactively combat climate change that simultaneously improve the environment such as: development buffers, native plant installation, and climate planning. SCAG should take a leadership role and develop case studies or pilot programs it funds to track climate reduction goals across the region.

**Page:** 40-41

**Reference:** “Many of the greatest environmental challenges facing the SCAG region, such as increasingly hot temperatures, poor air-quality, and wildfire can be partially or fully addressed by incorporating natural features or processes into the built environment. Known as “nature-based solutions,” these approaches are gaining traction in cities and communities around the world as strategies for adaptation and resilience to climate change, while providing social and economic co-benefits. Examples of nature-based solutions range from anything as simple as conserving existing natural lands, expanding urban tree canopy, to complex infrastructure projects such as reconstructing wetlands.” (emphasis added with underline)

**Comment:** Nature Based Solutions typically define solutions for modified **natural** environments, this section defined the focused only on the built environment. Therefore, this section should **also** recognize the natural environment.

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**Section:** 6.3 – Natural and Farmlands Preservation**Page:** 43**Reference:** “With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 18,032 acres of degraded habitat - 1,202 acres more than the Trend/Baseline.”**Comment:** Why are more natural and farmlands converted to urban uses with Connect SoCal than the baseline?**Page:** 43**Reference:** “Connect SoCal envisions Regional Advance Mitigation as a key pathway for natural and agricultural lands preservation, which is included as a Regional Strategic Investment that can support conservation as a means of mitigating the environmental impacts of transportation investments.”**Comment:** We support RAMP as a key pathway for land preservation. SCAG must take the critical next step to begin collaborating for implementation to take advantage of the 25-year horizon associated with this plan. Enabling language for RAMP should be included as a policy, implementing measure, or mitigation measure.**Page:** 44**Reference:** “With the loss of natural lands, there are resulting impacts to habitat areas where implementation of Connect SoCal will lead to 18,032 acres of degraded habitat - 1,202 acres more than the Trend/Baseline. Some areas are improved, however, as Connect SoCal will result in 1,891 acres of improved habitat - 666 acres more than the Trend/Baseline.”**Comment:** We do not understand how the Plan intends to protect GRRAs, focus development in PDAs, and yet 18,032 acres of degraded habitat and only 1,891 acres will be improved. The math doesn't add up. This seems like a bigger impact than actual savings.

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**Section:** 6.4 – Complete Communities**Page:** 47**Reference:** “List of tools that support realization of complete communities.”**Comment:** We support the addition of a Public Safety Component similar to that under consideration in Los Angeles County related to wildfire zones. (See [Wildfire Protection Ordinance](#)) This is one way SCAG can help support reducing development in the GRRAs and ensure smarter land use decisions in Very High Fire Hazard Severity Zones.

## PROJECT LIST

**Section:** The Project List Table

**Page:** 429

**Reference:** "Advance Mitigation/Other"

**Comment:** RAMPs are by their very nature focused on early permitting and project streamlining in advance of the project(s) actually being completed. With a 2050 completion timeframe for this plan, none of the mitigation will have been "advance" mitigation, which defeats the purpose. We encourage SCAG to identify implementation opportunities and collaborate with agencies to make RAMP a reality.

## PROGRAM ENVIRONMENTAL IMPACT REPORT

**Section:** Executive Summary

**Page:** ES-7

**Reference:** Environmental Goals

**Comment:** How does SCAG meet its environmental goal when 48,000+ and 8,100+ acres of natural and farmlands, respectively, are lost by 2050? It seems the environmental goal doesn't achieve anything. If it did meet the goal, this number would be considerably better.

**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](mailto:list@scag.ca.gov)."

**Comment:** The SoCal Greenprint should be added to this mitigation measure as it is a tool offered by SCAG.

**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)

**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.

Should you have any questions on our feedback, [REDACTED]  
[REDACTED] Thank you for the opportunity to provide these substantive comments and we look forward to reviewing the draft final plan.

Thank you,

*Claire Schlotterbeck*

Claire Schlotterbeck  
Executive Director

## Thoughts on Connect SoCal

### Overall

- 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.
- 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
- 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.
- 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.
- 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.
- 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.
- 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.

#### 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.

##### 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. “

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.

##### 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.

“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.

“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?

“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.” & “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?

“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.

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.



AMY J. BODEK, AICP  
Director,  
Regional Planning

DENNIS SLAVIN  
Chief Deputy Director,  
Regional Planning

December 20, 2023

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

**SUBJECT: ADDITIONAL COMMENTS FROM THE COUNTY OF LOS ANGELES ON THE DRAFT 2024 CONNECT SOCIAL GROWTH FORECAST**

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.

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



County of Los Angeles  
 December 20, 2023  
 Page 2

Centennial		
TAZ	Proposed 2050 Households	Proposed 2050 Employment
20280100	18,173	2,000
20281100	0	21,675

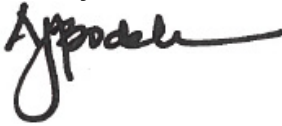
For the aforementioned TAZs we do not recommended changes to the growth forecast for hh2019 to hh2035 or for emp 2019 to emp 2035. Instead, we recommend SCAG increase the number of households and increase employment projections exclusively in the 2035 to 2050 timeframe.

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](mailto:abodek@planning.lacounty.gov), or Connie Chung, Deputy Director, at [cchung@planning.lacounty.gov](mailto:cchung@planning.lacounty.gov).

Sincerely,



Amy J. Bodek, AICP  
 Director of Regional Planning

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



**Submitted via electronic mail**

January 24, 2024

Hiroshi Ishikawa  
Senior Regional Planner – Aviation and Airport Ground Access Program, Travel and Tourism  
Southern California Association of Governments (SCAG)  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

**LAX**

**Van Nuys**

**City of Los Angeles**

Karen Bass  
Mayor

**Board of Airport  
Commissioners**

Karim Webb  
President

Matthew M. Johnson  
Vice President

Vanessa Aramayo  
Courtney La Bau  
Victor Narro  
Nicholas P. Roxborough  
Valeria C. Velasco

Beatrice C. Hsu  
Interim Chief Executive  
Officer

Re: Connecting SoCal 2024 Draft Technical Reports

Dear Mr. Ishikawa:

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).

Based on the review of the above-mentioned technical reports and associated sections, LAWA has the following comments:

**Aviation and Airport Ground Access Technical Report**

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)*”

LAWA requests the correction of text to “Airfield and Terminal Modernization Project (ATMP).”

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”.

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.

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*”.

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



Mr. Hiroshi Ishikawa  
 January 24, 2024  
 Page 2

(please refer to LAWA's current cargo tonnage report for 2023 at <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.

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".

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.

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.

LAWA requests a copy of SCAGs methodology and data used to forecast the daily truck trips for LAX as identified in Table 7.

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)"

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.

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"

LAWA requests SCAG update language to "West Intermodal Transportation Facility".

LAWA thanks SCAG for the opportunity to comment on the Draft Connect SoCal 2024 Plan, Draft Aviation and Airport Ground Access Technical Report, Draft Goods Movement Technical Report, and the Draft Projects List Technical Report. LAWA staff is available to

Mr. Hiroshi Ishikawa  
January 24, 2024  
Page 3

work with SCAG to address any questions that may arise from this comment letter. Please contact me, at [Equintanilla@lawa.org](mailto:Equintanilla@lawa.org) or Brenda Martinez-Sidhom of my staff at [bmartinez-sidhom@lawa.org](mailto:bmartinez-sidhom@lawa.org) should you have any questions or wish to discuss the comments.

Sincerely,

*Kathline King* for

Evelyn Quintanilla  
Chief of Airport Planning II

EQ:BMS:bms

cc: Emery Molnar, Deputy General Manager Airports, Airports Development Program  
Crystal Lee, Deputy General Manager Airports, The Development Group Services



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

IN REPLY REFER TO:  
11011  
January 12, 2024

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

Dear Ms. Calderon:

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

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

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

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

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

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.

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

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

1. Include a map of all military installations and airfields in the SCAG planning region.
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.
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.
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>.
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](https://www.opr.ca.gov/docs/20190812-2016_CA_Handbook.pdf).

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.

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](mailto:kendall.p.lousen.civ@us.navy.mil).

Sincerely,



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

Copy to:  
COMNAVREGSW (N46)

# CONNECT SOCIAL

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

# Housing

TECHNICAL REPORT

DRAFT | NOVEMBER 2, 2023

# Housing

TECHNICAL REPORT

DRAFT | NOVEMBER 2, 2023

1. EXECUTIVE SUMMARY	1
2. WHY HOUSING MATTERS	2
3. REGULATORY FRAMEWORK	3
4. EXISTING CONDITIONS	5
5. HOUSING PRODUCTION	22
6. REGIONAL BEST PRACTICES	31
7. BEST PRACTICES FOR JURISDICTIONS AND STAKEHOLDERS	37
8. HOUSING THE REGION: POLICY FRAMEWORK	44
9. CONCLUSION	46
10. REFERENCES	47



## 1. EXECUTIVE SUMMARY

Housing is an integral part of regional planning and is one of the most fundamental elements of local communities. Planning for housing is not only crucial for transportation and land use planning, but also to further equity. Addressing the housing crisis is also addressing equity.

In the State of California, Housing Element Law is the major driver for housing policy at the local level. One mechanism by which housing need throughout the region is determined is through the Regional Housing Needs Assessment (RHNA) process, a statutory process to allocate a regional housing allocation to the local jurisdictional level. Jurisdictions are required to update their housing element through sites and zoning analysis to accommodate their allocated need.

This Technical Report will outline the history of housing policy and resulting racial disparities in the region, legislative and statutory requirements that guide housing policy, existing conditions and challenges faced by the SCAG region, and elevate the regional planning policies and implementation strategies that the Southern California Association of Governments (SCAG) is advancing in the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Connect SoCal 2024 or the "Plan", to meet this need. Moreover, the additional issues of climate change have created new challenges in meeting regional housing need and have required the consideration of additional strategies in regional planning. 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, should occur in the region in alignment with Connect SoCal 2024.

Existing housing conditions illustrate a housing crisis that has been decades in the making. A shortfall of housing to meet the needs of the SCAG region have created issues such as cost-burden and overcrowded households. These impacts disproportionately burden historically underserved communities that experience displacement pressure due to market conditions and without additional housing in these areas may result in further segregation and reduced accessibility to resources.

There are numerous barriers to housing production at all points in the process. Barriers such as a lack of resources, community opposition, increasing construction costs, and the fiscalization of land use can delay, reduce, or prevent housing production.

Strategies to address the housing crisis can be implemented at the State, regional, and local levels. Funding is available from the State to implement plans and projects at the regional and local levels. In the past few years, SCAG has created a variety of tools and technical assistance to support jurisdictions in planning for housing. Jurisdictions can also implement a variety of tools to increase housing production. SCAG's long-term strategies for housing include supporting efforts to produce and preserve housing, promoting housing in priority growth areas, and prioritizing key communities such as low-income and communities of color. Long term SCAG implementation strategies include providing technical assistance to housing element implementation, aligning housing-supportive infrastructure, and continuing its outreach and education efforts.

Over the past few years, SCAG has developed a regional housing program to address the needs of our region and for the first time, a housing-focused Technical Report is included in the RTP/SCS. This Technical Report will outline the existing conditions of housing in the SCAG region, the challenges in addressing it, and affirmative strategies that seek to counter the impacts of historic practices.

## 2. WHY HOUSING MATTERS

A lack of housing, including affordable housing, can lead to a variety of problems that affect our society at different levels. Despite market fluctuations, housing production has not kept up with demand. The housing crisis is an accumulation of decades of not building sufficient housing.

However, the impacts of the housing crisis disproportionately burden historically underserved communities, such as low-income households and communities of color, and historical inequitable policies at all levels of government have led to the concerning disparities we see today. Institutional and systemic racism experienced by these communities continues to impact their access to more mobile, sustainable, and prosperous futures in Southern California.

In 1934, the Federal Housing Administration (FHA) was established to facilitate numerous tasks, including home financing, improving housing standards, making housing and mortgages more affordable, and increasing employment in the home construction industry in the wake of the Great Depression. 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 unable to build generational wealth that accompanies homeownership. This FHA home-valuation system was known as “redlining” because maps used by the FHA used red to color code neighborhoods where Black residents live to indicate these areas were too risky to insure mortgages.<sup>1</sup> Further exacerbating this inequity, the FHA tacitly endorsed the use of restrictive covenants, which were private agreements attached to property deeds to prevent the purchase of homes by Black, Hispanic (Latino), Asian, and Native American people. While the FHA announced that it would not insure mortgages with restrictive covenants in 1950, redlining lasted until the mid-1960s.

In addition to redlining, people of color still faced many challenges, such as negligent landlords and chronic disinvestment, which intersected with an influx of Black residents seeking homes as part of the “Second Great Migration,” when major populations of Black residents migrated west during World War II.<sup>2</sup> People of color had few choices on where to live, and neighborhoods where they were allowed became overcrowded and often took on unhealthy living conditions. Many of these neighborhoods were located next to polluting industrial infrastructure. As highway infrastructure expanded, these new freeways not only cleared existing neighborhoods, but also contributed to heavy air pollution that has led to ongoing asthma and serious health conditions in remaining residents.<sup>3</sup>

Even in neighborhoods where people of color found housing, urban renewal policies destroyed existing communities and displaced their residents. The Federal Housing Acts of 1949 and 1954 led to the demolition of neighborhoods inhabited by people of color. The Acts enabled the clearing of blighted areas and destroyed affordable housing units in urban areas. A notorious example of these impacts in Southern California is the clearance of Chavez Ravine, a Mexican American community with its own stores, church, and school. Many families lived there due to redlining in other parts of the City of Los Angeles, but with the population expanding the area was viewed as a prime, underutilized location. The City of Los Angeles labeled the area as blighted and approved the construction of thousands of new public housing units in Chavez Ravine. While residents were told they would have first choice for homes in the new units, public housing was never built, and the remains of Chavez Ravine instead became the site of Dodger Stadium.<sup>4</sup>

Today, the quantitative impacts of the housing crisis such as overcrowding, cost-burden, and home ownership, disproportionately burden communities of color. Addressing the housing shortage not only

## Connect SoCal | Housing Technical Report

means increasing housing supply, but it also means addressing equity and historic segregation patterns. Approaching the housing crisis through this lens is needed to advance equity and diversity across the region. Understanding the disparities resulting from historical inequities is central to SCAG's work as a regional planning organization to plan for a more racially just, equitable future.

For purposes of this report, "affordable housing" is considered as housing that is affordable for lower income households. There are numerous definitions used for affordable housing and depending on the context, geography, and purpose, will have differing quantitative thresholds as a definition. Because of these different definitions and thresholds, this Technical Report does not specifically define a quantitative threshold for what constitutes affordable housing.

### 3. REGULATORY FRAMEWORK

#### 3.1 LOCAL GENERAL PLANS AND HOUSING ELEMENTS

Every city and county in California are required to develop and update a General Plan. A General Plan is a comprehensive long-range document that informs future land use decisions within the jurisdiction. Within the General Plan is a set of goals, objectives, policies, and implementation measures covering topics such as land use, transportation, housing, open space, and natural resources. A jurisdiction's General Plan represents a blueprint for meeting the community's long-term vision for the future and reflects its values and aspirations.

Of the seven State-law mandated "elements" of a General Plan (i.e., land use, circulation, housing, conservation, open space, noise, and safety), a housing element is inarguably the most influential on a jurisdiction's housing goals and strategies. Provisions in the housing element are more specific and directive than other elements and contain detailed guidance and reviews. The law also provides the California Department of Housing and Community Development (HCD) with unique authority over the housing element.<sup>5</sup>

Jurisdictions are required to update their local housing element to demonstrate how they would accommodate future housing need by preparing a sites inventory. The site inventory identifies land that is suitable for residential development that can be developed for housing within the planning period, including vacant sites and sites having the potential for redevelopment. 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.

HCD reviews submitted housing element drafts and provides comments to the jurisdiction, if needed. After any needed revisions, jurisdictions must submit an adopted housing element to HCD for approval of compliance with State housing law. For the most recent cycle, also known as the 6th cycle, the statutory deadline to receive compliance for the SCAG region was October 2021.

While SCAG is not involved in the housing element approval process, SCAG has developed data tools and other technical assistance to support jurisdictions preparing their housing elements.

## 3.2 REGIONAL HOUSING NEEDS ALLOCATION

As part of its housing element update, a jurisdiction must demonstrate how it would accommodate its allocated housing need for the planning period, also known as the Regional Housing Needs Assessment (RHNA) allocation. The RHNA allocation is a representation of existing and future housing needs by income level for the jurisdiction and is measured by housing units. The allocation for each jurisdiction is developed by a local Council of Governments (COG) such as SCAG. The RHNA process is repeated every eight years to ensure that the State's housing needs are being met and coincides with the housing element update period. The 5th RHNA cycle covered planning period October 2013 to October 2021 and the current RHNA Cycle, the 6th cycle, covers the housing element planning years October 2021 to October 2029.

As provided in Government Code Section 65584, the RHNA must further five objectives:

1. Increase housing supply and mix of housing types, with the goal of improving housing affordability and equity in all cities and counties within the region.
2. Promote infill development and socioeconomic equity; protect environmental and agricultural resources; encourage efficient development patterns; and achieve greenhouse gas reduction targets.
3. Improve intra-regional jobs-to-housing relationship, including the balance between low wage jobs and affordable housing units for low-wage workers in each jurisdiction.
4. Balance disproportionate household income distributions (more high-income allocation to lower-income areas, and vice-versa).
5. Affirmatively further fair housing.

Affirmatively furthering fair housing: taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

The RHNA process begins with HCD providing each COG a regional determination for the RHNA cycle. For the 6th cycle, HCD determined that the housing need for the SCAG region was 1,341,827 units. The regional determination is calculated using several factors, such as population growth, household formation rates, overcrowding, cost-burden, and vacancy needs. In comparison, the 5th RHNA cycle regional determination was 412,137. In addition to the new statutory requirements to factor cost-burden and overcrowded households in its calculation, HCD also placed special emphasis on existing need, which resulted in a noticeably higher allocation than the prior cycle.

After receiving its regional determination SCAG then developed and adopted a distribution methodology to determine the RHNA allocation for each of the region's 197 jurisdictions. The RHNA methodology distributed housing need based on future household growth, access to transit, access to jobs, and

## Connect SoCal | Housing Technical Report

included consideration of disadvantaged communities. Together these distribution factors further the five objectives codified in State housing law and strengthens its connection to Connect SoCal 2024. For example, focusing on access to transit and jobs supports the objectives of promoting infill development, encouraging efficient development patterns, achieving the reduction of both greenhouse gas emissions and vehicle miles traveled, and improving intra-regional jobs-to-housing relationship. Meanwhile, these factors strengthen SCAG's Connect SoCal regional strategies of growth near destinations and mobility options, such as emphasizing land use patterns that facilitate multimodal access to work, educational and other destinations and prioritizing infill and redevelopment of underutilized land to accommodate new growth and increasing amenities and connectivity in existing neighborhoods. Additionally, the consideration of disadvantaged communities in the adopted RHNA methodology furthers the State housing law objectives of increasing housing supply and mix of housing types, balancing disproportionate household income distributions across the region, and affirmatively furthering fair housing. Further connecting it to the Plan, the consideration of disadvantaged communities in the methodology strengthens the Plan's strategies of preventing displacement and reducing regulatory barriers to streamline the development of various housing types to increase housing supply.

The final RHNA plan was adopted by SCAG in March 2021.

Table 1. SCAG 6th Cycle Regional Housing Needs Allocation Plan

Region	Very-Low Income	Low Income	Moderate Income	Above Moderate Income	Total
Imperial County	4,671	2,357	2,198	6,767	15,993
Los Angeles County	217,273	123,022	131,381	340,384	812,060
Orange County	46,416	29,242	32,546	75,657	183,861
Riverside County	41,995	26,473	29,167	69,716	167,351
San Bernardino County	35,667	21,903	24,140	56,400	138,110
Ventura County	5,774	3,810	4,525	10,343	24,452
SCAG	351,796	206,807	223,957	559,267	1,341,827

Source: SCAG

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.

## 4. EXISTING CONDITIONS

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. The following section covers key data on housing characteristics including the age of housing structures, rates of homeownership, substandard housing conditions such as lacking kitchen facilities and indoor plumbing, cost-burden, overcrowding, displacement pressures and gentrification, and homelessness. When deemed appropriate, these characteristics were further evaluated based on income, tenure, and race/ethnicity. This deeper analysis allows for more equitable responses across historically

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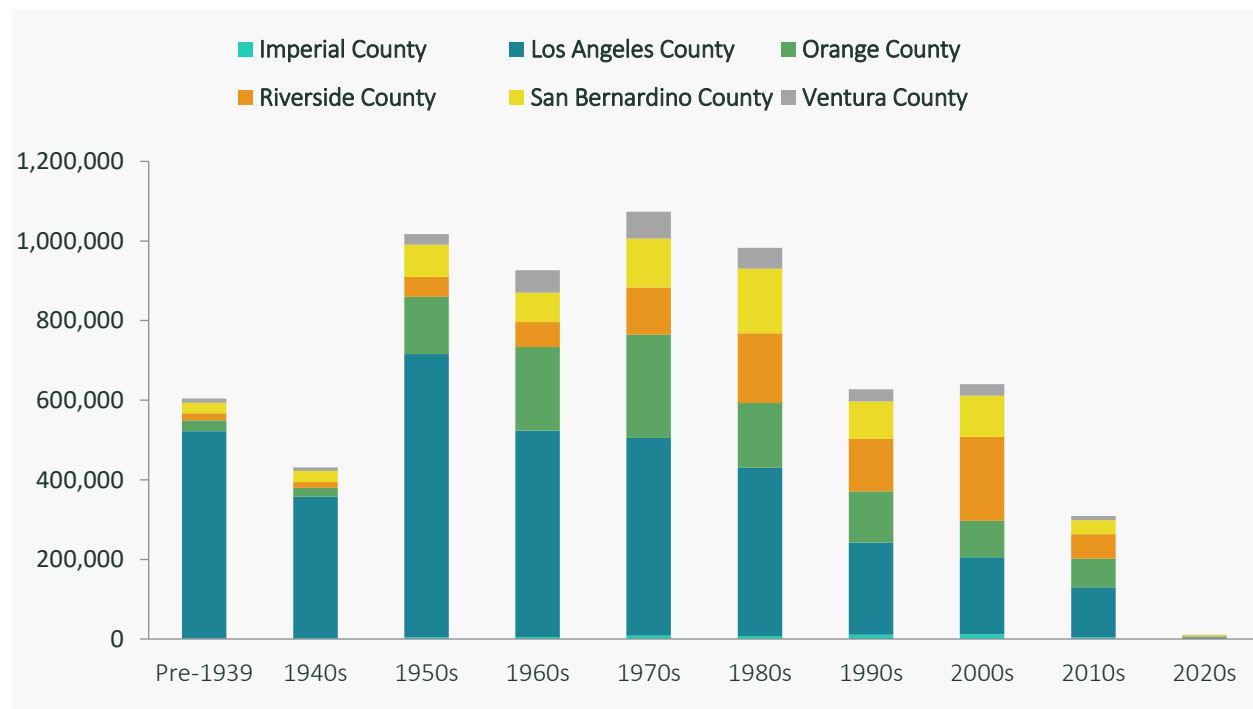
disproportionately burdened communities. Evaluating the region's housing existing conditions helps SCAG understand the challenges the region is facing to develop implementation strategies and policies to alleviate these challenges moving forward.

### 4.1 HOUSING STOCK

The SCAG region hosts a total of 6,622,509 units in its housing stock. Over half of these units were built before 1980, approximately over 40 years ago. The SCAG region follows California's trend of increasing housing production until 1980 when housing production begins to decrease dramatically each year thereafter, which has led to a housing shortage (Figure 1). Moreover Senate Bill 375 (SB 375) became law in 2008 but since then, only 5 percent of total housing stock has been built. While this indicates that growth in housing supply has been slower than anticipated, it also indicates a significant barrier to realizing the vision of SB 375 as the only way to get more housing near transit is to also have more housing overall.

Geographically in the SCAG region, as housing production continued to dwindle in Los Angeles County, housing production stayed strong in the Inland Empire, which encompasses Riverside and San Bernardino Counties. Determining where housing is needed is a major geographical challenge. Housing production is needed across the region, and in addition to infill areas and other urban locations, housing is still needed in less dense and connected areas. The underproduction of housing has had negative implications on people throughout the region, leading to overcrowding and additional cost burden that disproportionately affect communities of color.

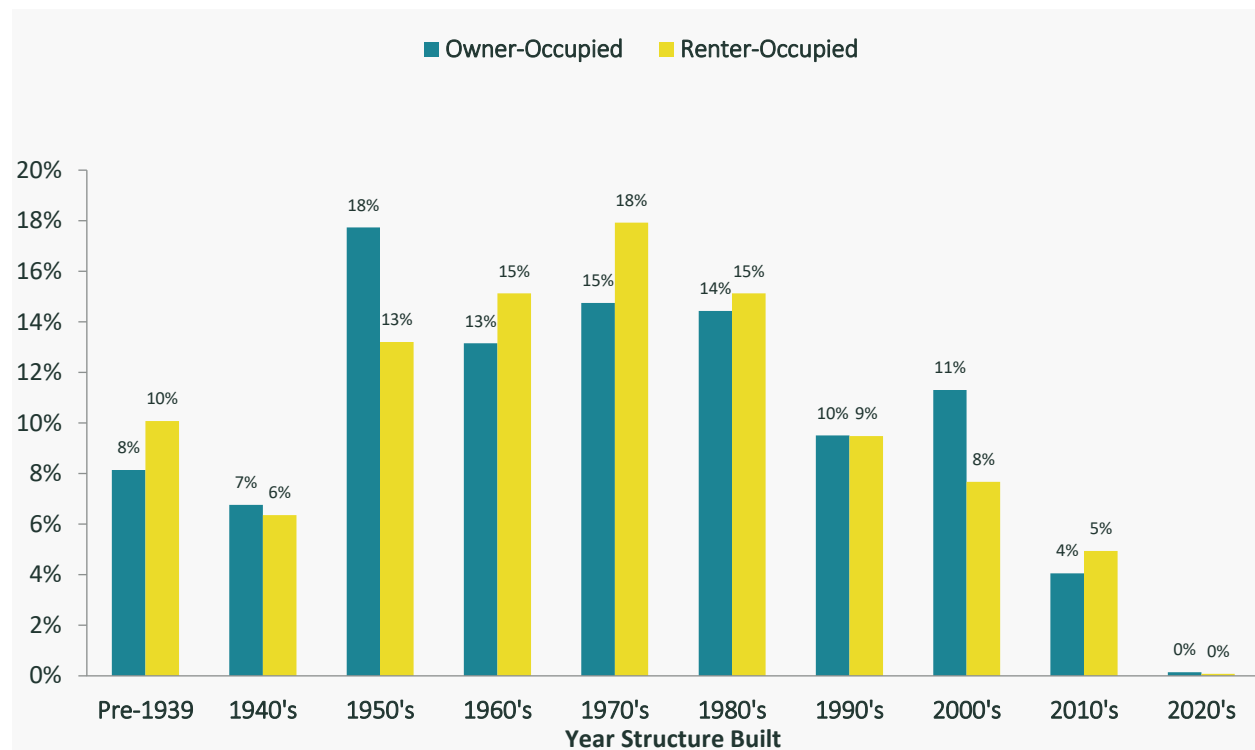
Figure 1. SCAG Counties 2021 Housing Stock by Year Structure Built



Source: U.S. Census Bureau 2021 American Community Survey (1-Year Estimates) Table B25034

## Connect SoCal | Housing Technical Report

Figure 2. SCAG Region 2021 Housing Stock Tenure by Year Structure Built



Source: U.S. Census Bureau 2021 American Community Survey (1-Year Estimates) Table B25036

A snapshot of current housing stock reveals that 75 percent of owners and 77 percent of renters reside in a structure built before 1990. 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.

## 4.2 HOUSING TENURE

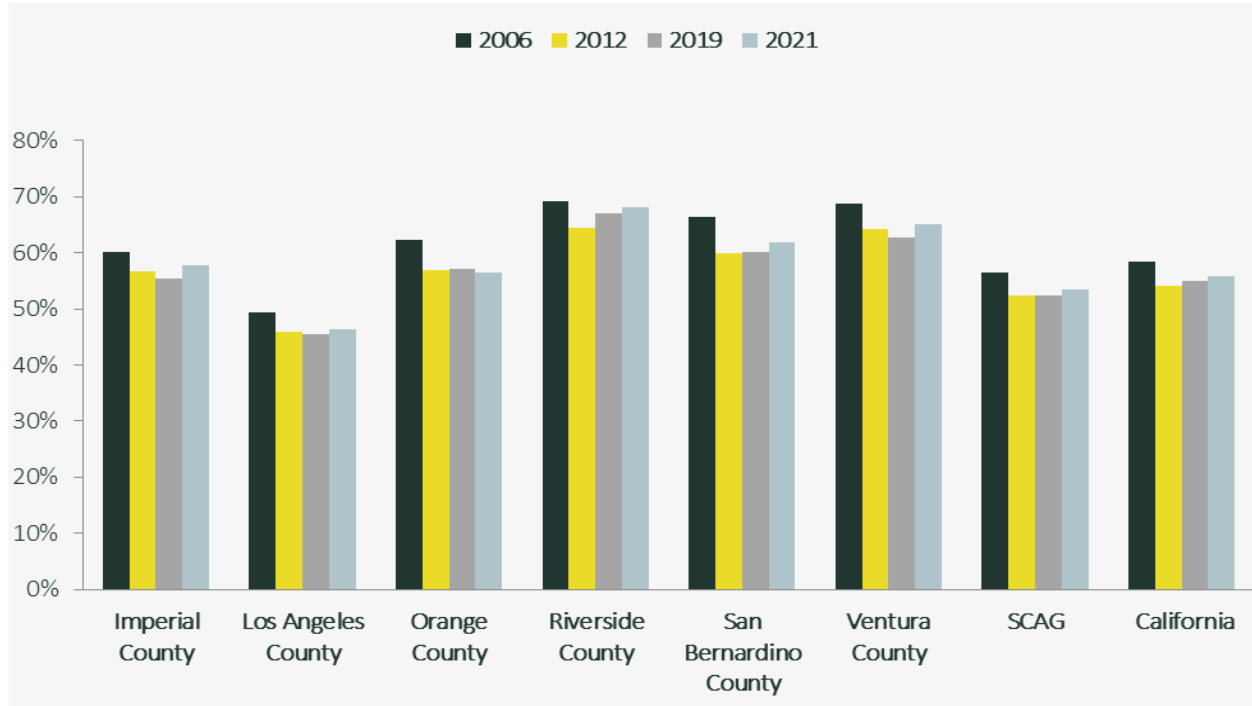
Housing tenure is an indicator of whether a housing unit is occupied by an owner or a renter. Homeownership is a significant contributor to building wealth. In 2021, 53.5 percent of all occupied housing units were owner-occupied while 46.5 percent were renter occupied. In every county there are more 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.

Historically across the United States, families of color faced discriminatory lending practices and restrictive covenants, preventing them from owning a home and building generational wealth. Communities of color today still feel the effects of these discriminatory practices. According to SCAG's 2022 Racial Equity Baseline Conditions Report, 61 percent of White households owned their home compared to only 58 percent of Asian/Pacific Islander households, 44 percent of Hispanic (Latino) households, 36 percent of Black households, and 47 percent of Native American households. This means that White household

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homeownership is nearly twice the rate of Black households. In addition, Los Angeles County is the only county within the SCAG region that houses more renters than homeowners at 55 percent.

Figure 3. California and SCAG Region Share of Owner-Occupied Housing Units

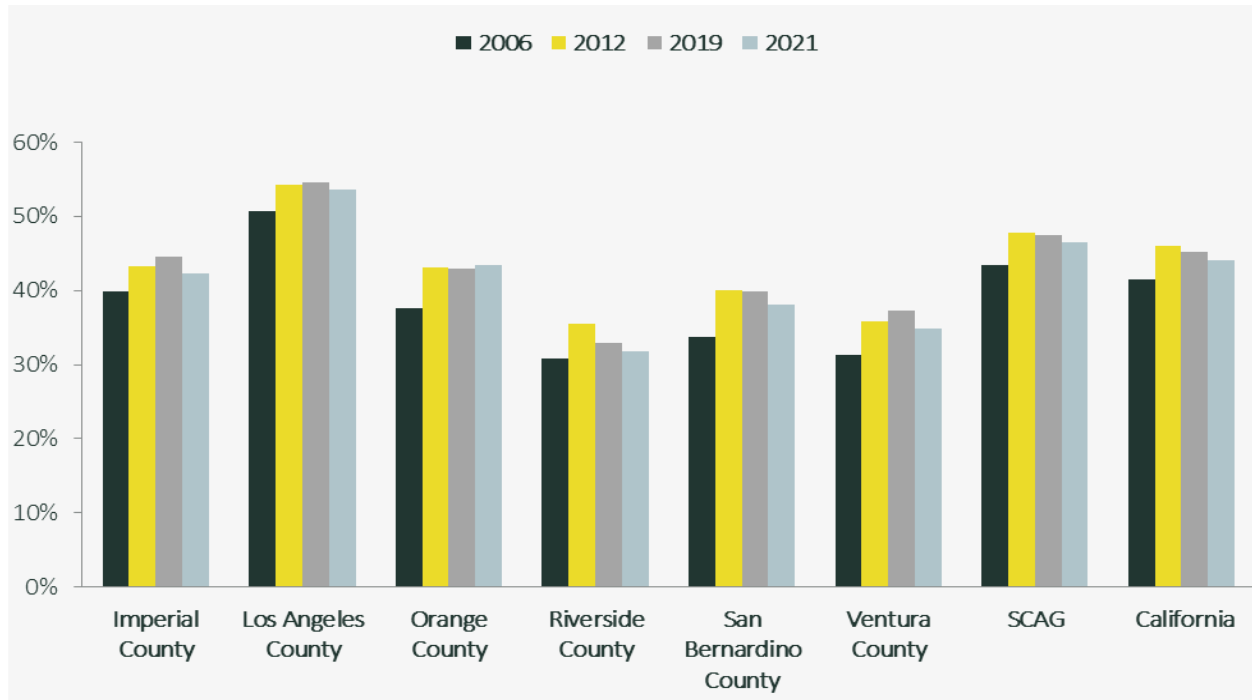


Source: U.S. Census Bureau 2006, 2012, 2019, and 2021 American Community Survey (ACS) 1-Year Estimates Table A10060



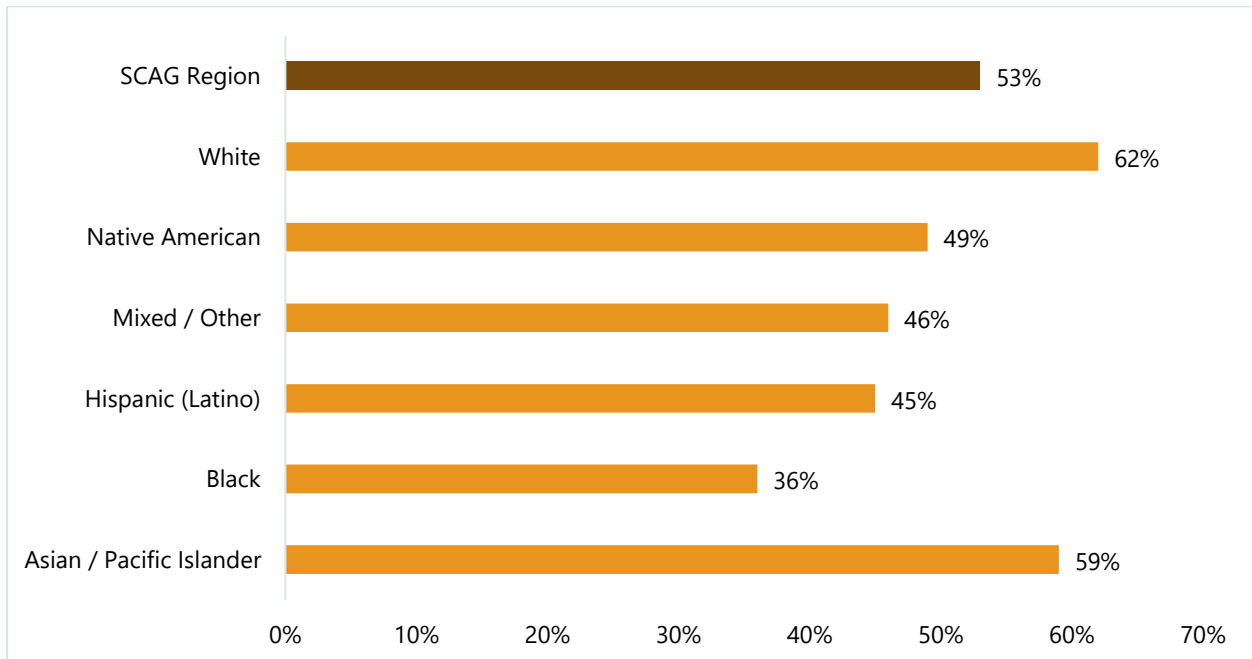
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Figure 4. California and SCAG Region Share of Renter-Occupied Housing Units



Source: U.S. Census Bureau 2006, 2012, 2019, and 2021 American Community Survey (ACS) 1-Year Estimates Table A10060

Figure 5. Homeownership by Race and Ethnicity



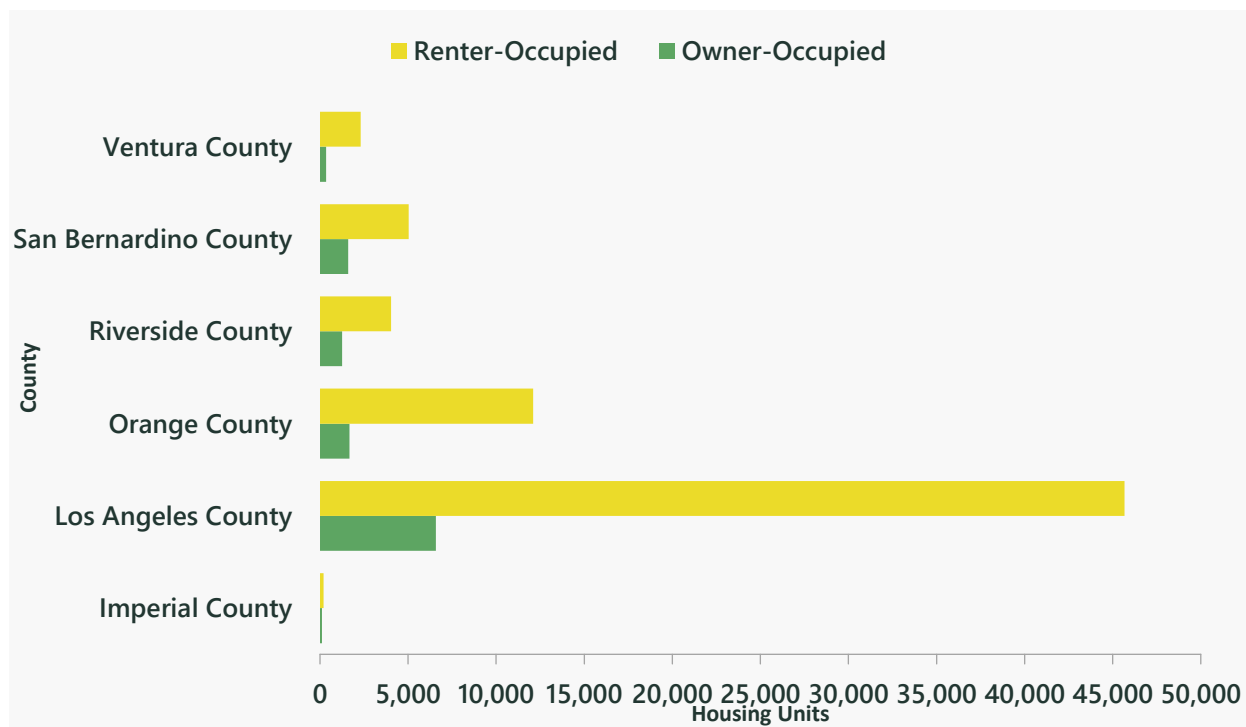
Source: U.S. Census Bureau American Community Survey (ACS) Public Use Microdata Sample (PUMS) 2017-2021

### 4.3 COMPLETE FACILITIES

For standard housing units, a complete kitchen requires a sink with a faucet, a stove, and a refrigerator and complete plumbing requires hot and cold running water, and a bathtub or shower. If a housing unit does not include one of these items, it is considered lacking complete kitchen or complete plumbing facilities. These essential amenities greatly impact a household’s ability to maintain sanitation and quality of life. In addition, households lacking complete kitchen facilities are at greater risk of food insecurity and poor health outcomes. While most of both owner- and renter-occupied units have complete kitchen and plumbing facilities, there are still 80,909 units lacking complete kitchen facilities (Figure 6) and 22,822 units lacking complete plumbing facilities in the SCAG region (Figure 7). These substandard units tend to be renter-occupied rather than owner-occupied.

This issue becomes more pronounced when analyzing rates among communities of color and comparing them to White communities and regional averages. SCAG’s 2022 Racial Equity Baseline Conditions Report found that in the SCAG region, Native Americans and Black residents are three times more likely to live in housing units without plumbing facilities than White households (1.1 percent, 0.7 percent, and 0.3 percent, respectively). Across the region, 1.4 percent of White residents live in housing units without complete kitchen facilities, compared to 2.0 percent for Native Americans and 1.8 percent for Asians/Pacific Islanders. This inequity is particularly apparent in rural Imperial County, where one out of every 20 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 Black people live without kitchen facilities compared to White people at 1.2 percent.<sup>6</sup> The disproportionate rates of substandard housing in communities of color compared to 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.

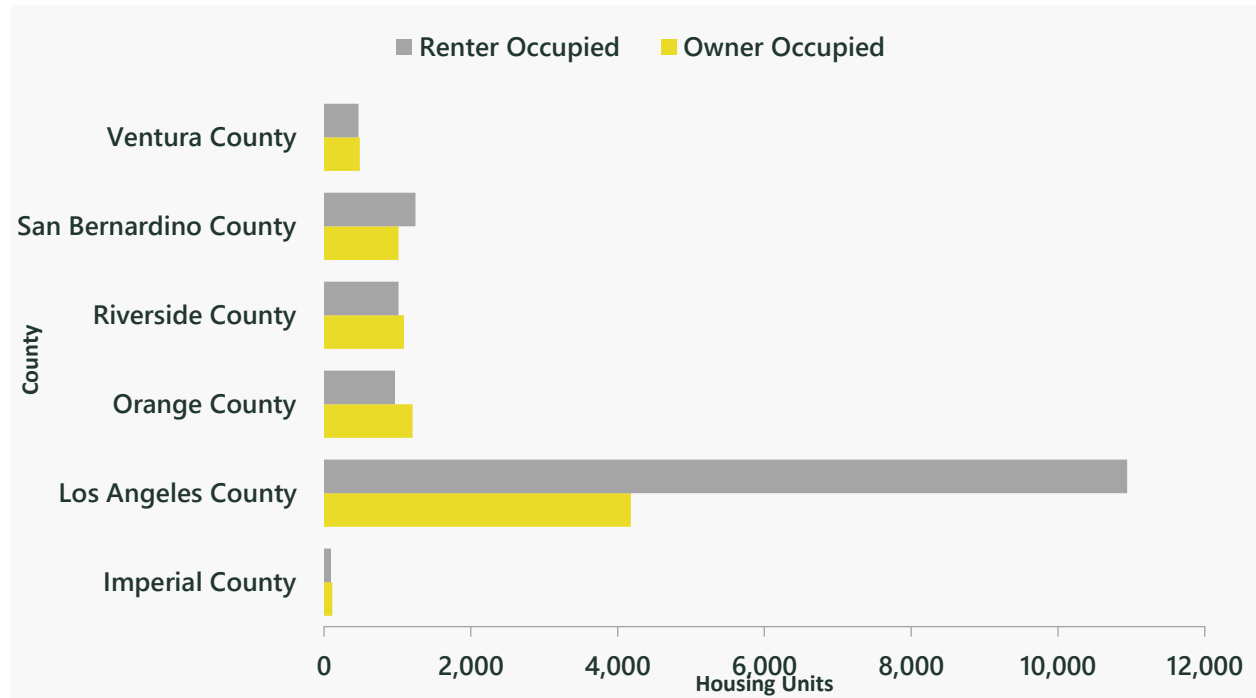
Figure 6. SCAG Counties Housing Units Lacking Kitchen Facilities by Tenure



Source: U.S. Census Bureau 2021 American Community Survey (1-Year Estimates) Table B25053

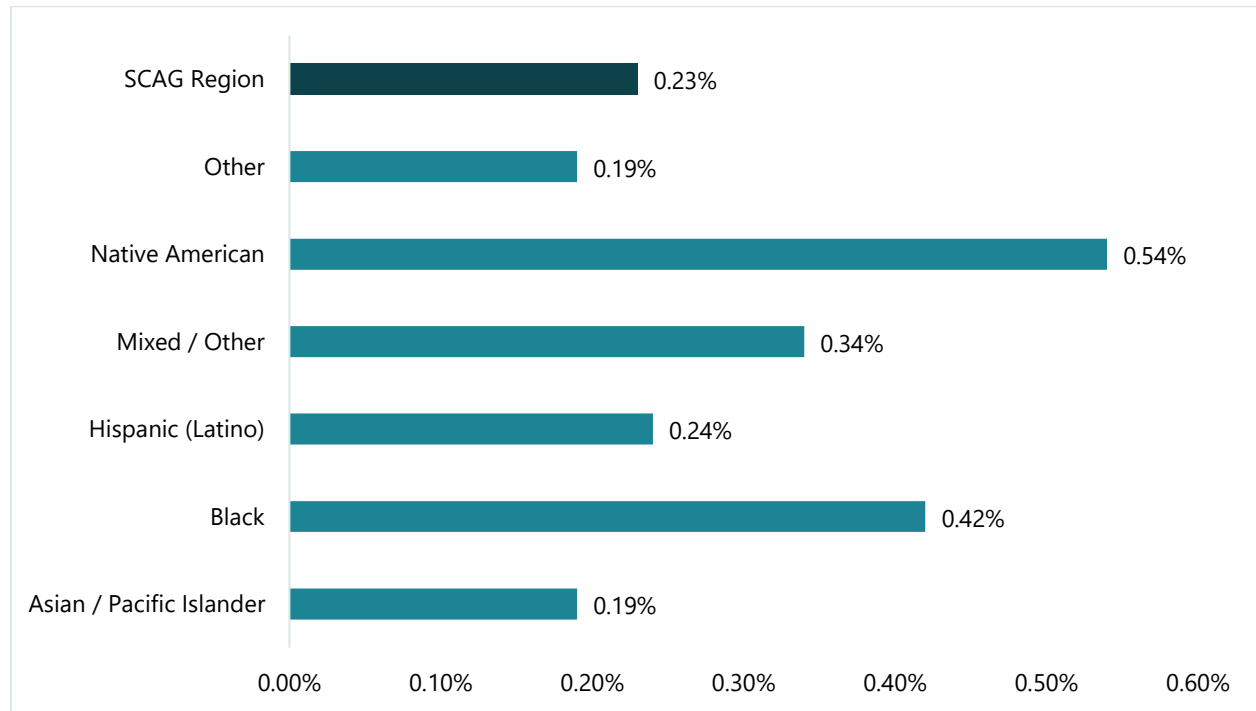
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Figure 7. SCAG Counties Households Lacking Plumbing Facilities by Tenure



Source: U.S. Census Bureau 2021 American Community Survey (1-Year Estimates) Table B25049

Figure 8. SCAG Region Households Without Kitchen and Plumbing Facilities by Race and Ethnicity

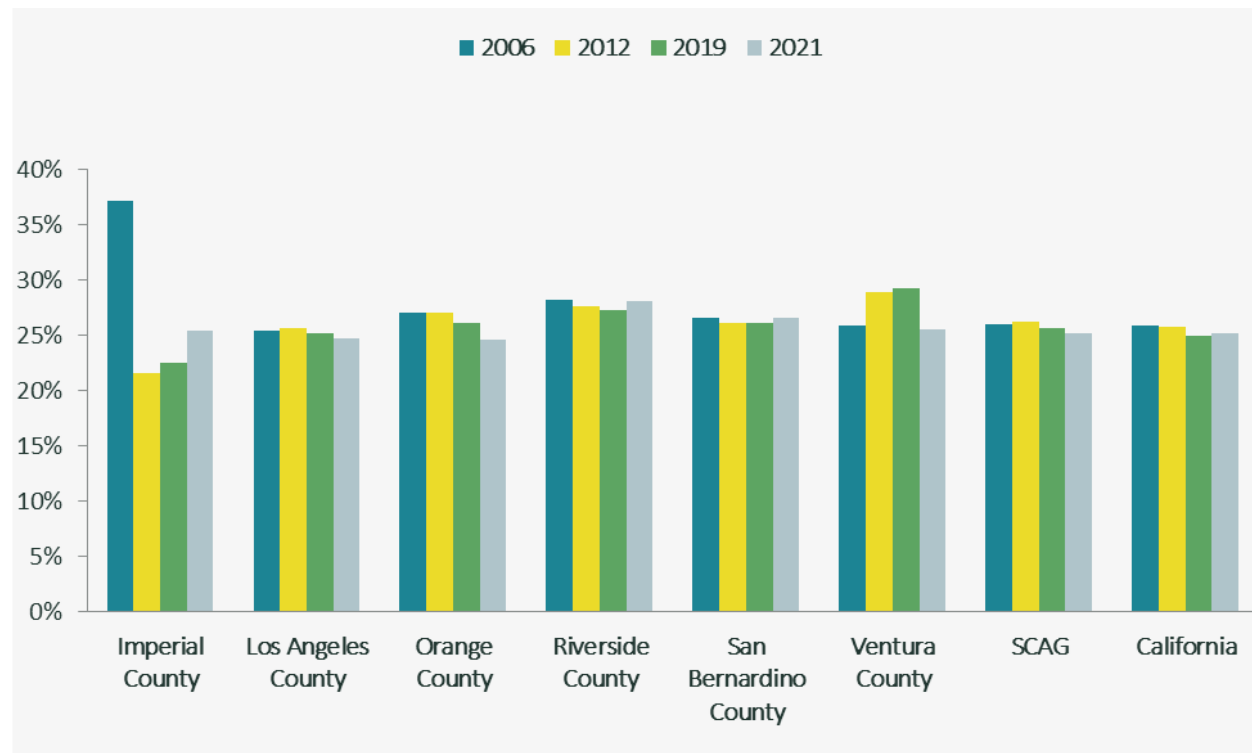


Source: U.S. Census Bureau American Community Survey (ACS) Public Use Microdata Sample (PUMS) 2017-2021

## 4.4 COST BURDENED HOUSEHOLDS

A conventional indicator of housing affordability is the percentage of household income spent on housing. Housing expenditures that exceed 30 percent of household income have historically been viewed as an indicator of a housing affordability problem, both for rental and owner-occupied housing. Households that spend more than 30 percent of their income on housing are considered “overpaying” and will have less income to spend on both essential needs, such as food and transportation, and discretionary purchases. In 2012, 57 percent of SCAG region renters spent more than 30 percent of their income on housing. By 2019, this figure dropped to 53.4 percent but climbed back to 55.0 percent by 2021. Severe cost-burden, defined as households that spend at least 50 percent of their income on housing, represented 30.8 percent of all renters and decreased to 29.8 percent in 2021 (Figure 9).

**Figure 9. SCAG Counties Cost Burdened Households (over 30% and less than 50%)**

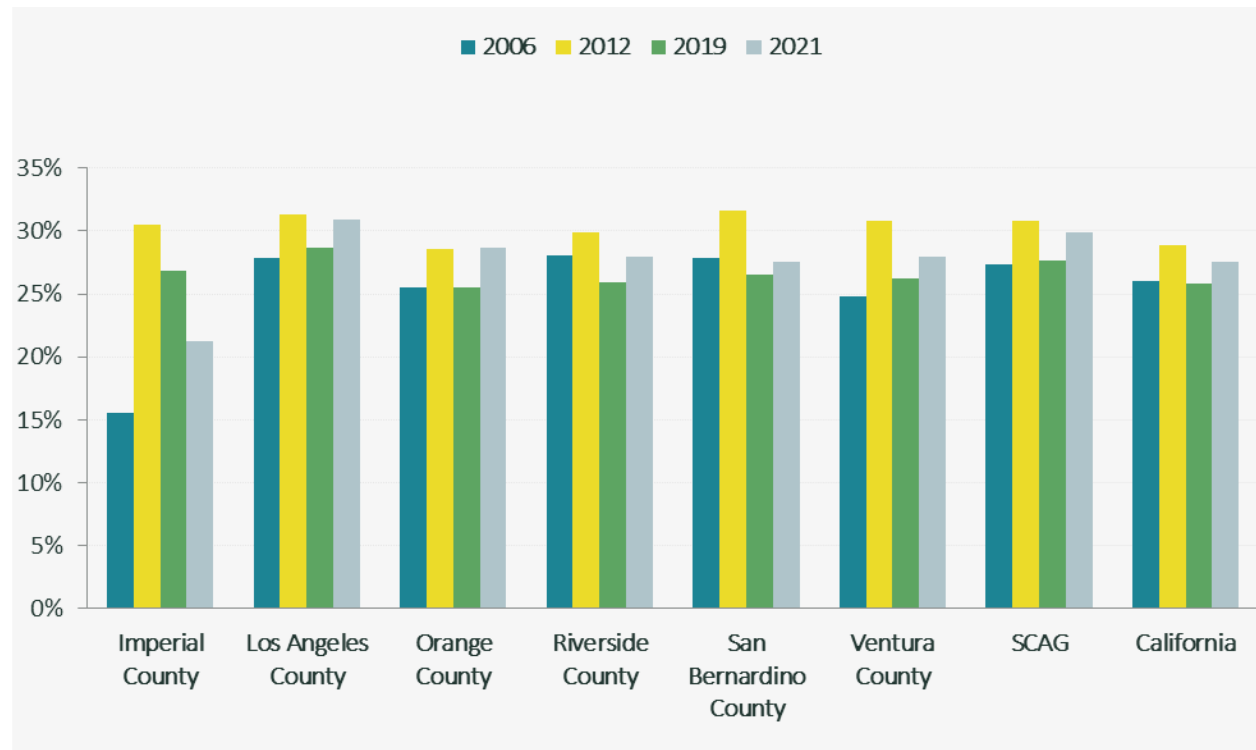


Source: U.S. Census Bureau 2006, 2012, 2019, and 2021 American Community Survey (1-Year Estimates) Table A18002

As a percentage of severe cost burden households to all cost-burden households, the figure increased from 54 percent to 54.2 percent (Figure 10). While this is a small increase, there are variations among SCAG counties. In Imperial County, the ratio of severely cost-burden households dropped by 13 percent and in San Bernardino County, the ratio dropped by 3.9 percent. However, in Orange County, the ratio of severely cost-burden households of overall paying renters increased by 2.4 percent.

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**Figure 10. SCAG Counties Severely Cost Burdened Households (over 50%)**



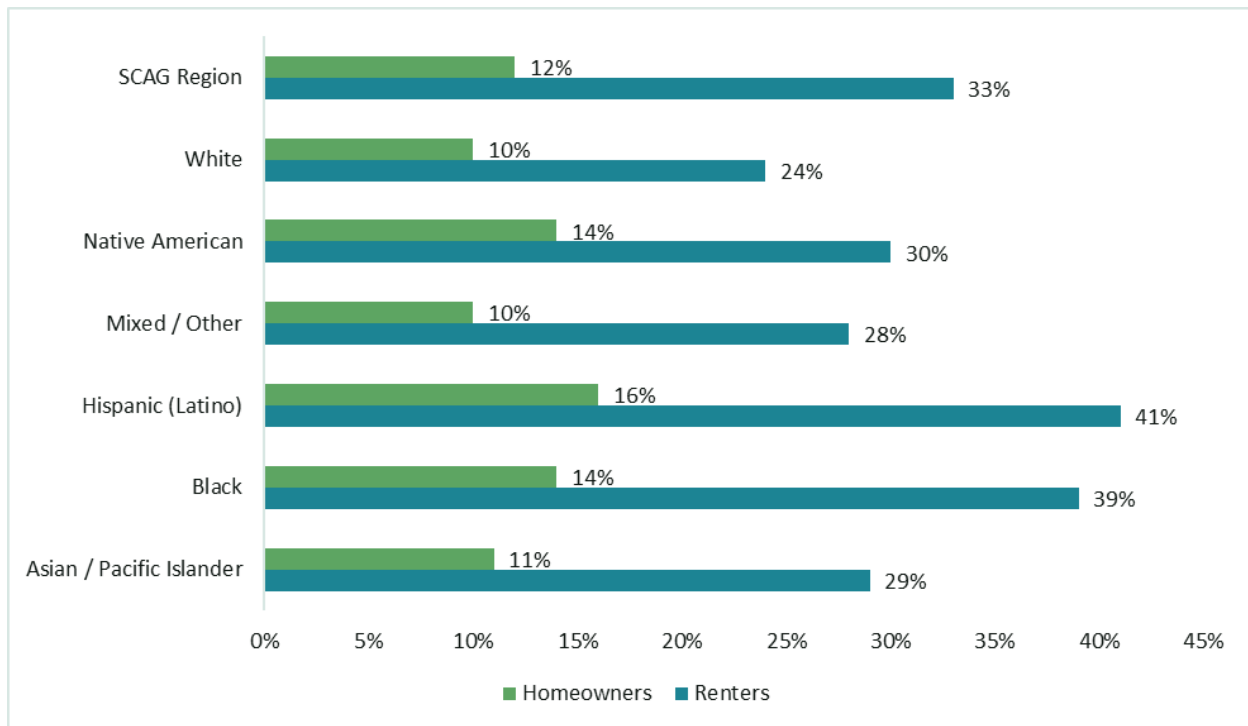
Source: U.S. Census Bureau 2006, 2012, 2019, and 2021 American Community Survey (1-Year Estimates) Table A18002

For owners with mortgages, there is a similar drop in the percentage of households that pay more than 30 percent of their income on housing, though, there is a more dramatic drop at 23.5 percent between 2012 and 2019, and a 23.7 percent drop between 2012 and 2021. Severely cost-burdened households with mortgages also declined between 2012 and 2019 at 26.2 percent and between 2012 and 2021 at 20.4 percent.

Combining these two categories indicates that of all occupied housing units, 43.2 percent of the SCAG region is considered cost-burden.

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Figure 11. SCAG Region Renters and Homeowners Living Below 200% of the Federal Poverty Line Experiencing Cost Burden by Race and Ethnicity



Source: U.S. Census Bureau ACS PUMS, 2017-2021

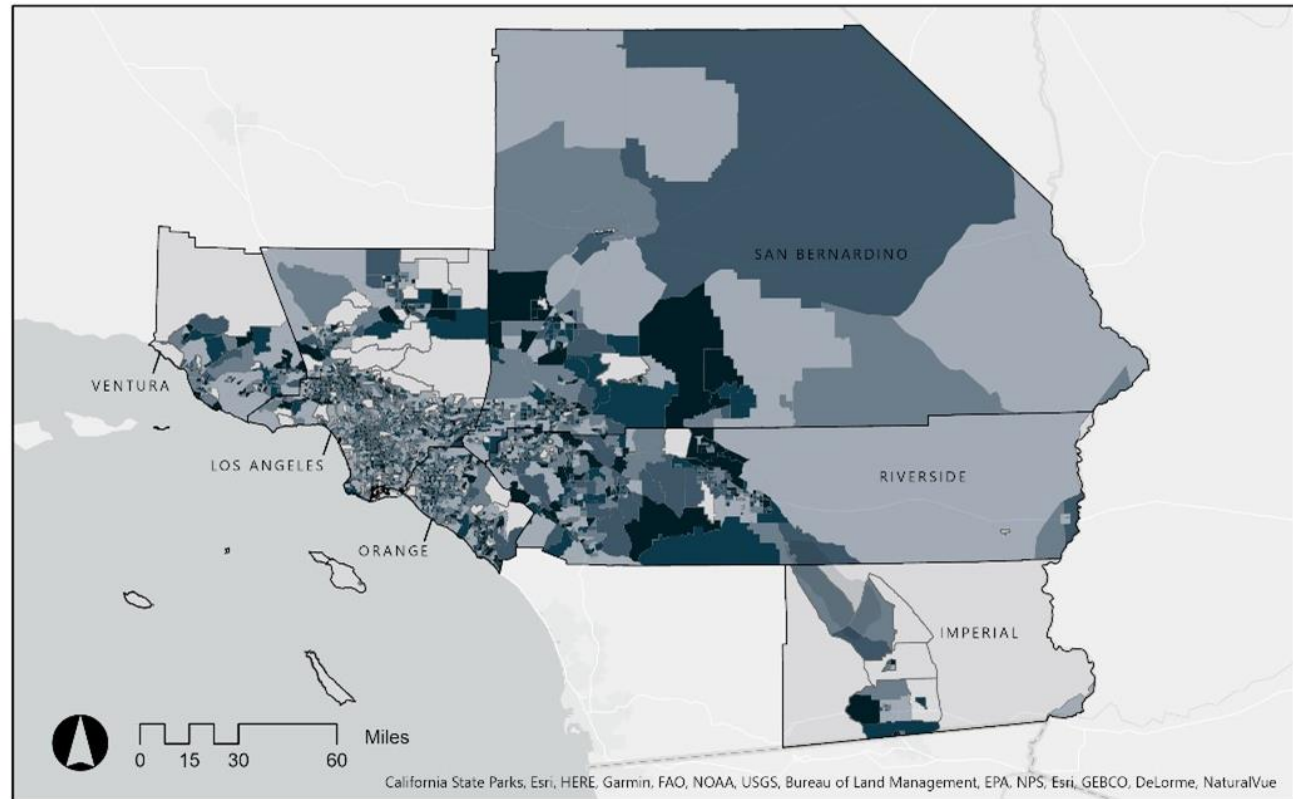
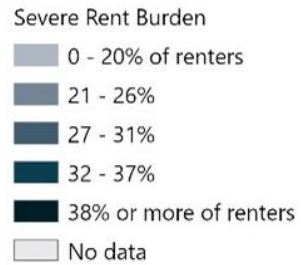
Figure 11 shows a deeper analysis of cost burden by looking at renters and homeowners who are living below 200 percent of the federal poverty line experiencing cost burden by race and ethnicity. All other racial and ethnic households experienced greater cost burden regardless of whether they rent or own their homes than when compared to White households. Hispanic (Latino) and Black homeowners and renters experience the greatest cost burden across racial and ethnic households in the SCAG region.

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Map 1. SCAG Region Severe Rent Burden Households (over 50%)

# Severe Rent Burden

The percentage of renters paying 50% or more of their income on rent



Public Health Alliance of Southern California, SCAG, 2022  
Date: 10/12/2022

California State Parks, Esri, HERE, Garmin, FAO, NOAA, USGS, Bureau of Land Management, EPA, NPS, Esri, GEBCO, DeLorme, NaturalVue

Source: Public Health Alliance of Southern California, SCAG, 2022

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When considering income, there are emerging inequities for households with very low income. Severe overpayment is a particular burden for low-income families, who have extremely limited resources to spend on daily needs such as transportation, food, and healthcare in addition to housing costs. In the SCAG region, 62 percent of households that have an annual income under \$50,000 pay over half their income toward housing.

A disparity in cost burden emerges in a further analysis between communities of color and White communities. Across the region, Black, Hispanic (Latino), and Native American households – regardless of whether they own or rent – experience the greatest housing cost burdens. While a little over one of four White households pay more than 30 percent of their income on rent, almost one out of two Hispanic (Latino) households do (46 percent). This figure is 41 percent for Black households and 33 percent for Native American households. The high burden of housing costs carries over into homeownership. For Hispanic (Latino) home-owning households, 18 percent are cost burdened and is 14 percent and 17 percent for Black and Native American households, respectively. This is significantly higher than the rate for White home-owning households at 10 percent.

Considering that communities of color have almost twice the rate of poverty (households below 200 percent the poverty line) than the 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. A lack of sufficient income has multiple long-term and potentially generational consequences on health, well-being, and economic success.<sup>7</sup>

## 4.5 OVERCROWDING

For families who want to reduce housing costs but cannot find affordable local housing options, many turn to sharing housing units with other households or reside in homes that are too small for their household size. These situations lead to overcrowding problems in local communities that face either lack of affordable housing, a shortage of housing, or both. The U.S. Department of Housing and Urban Development (HUD) defines overcrowding as more than 1.01 persons per room in a housing unit. In certain areas, the definition of overcrowding as mentioned may not be reflective of local or cultural preference, and the definition may overstate existing conditions of overcrowding in some communities.

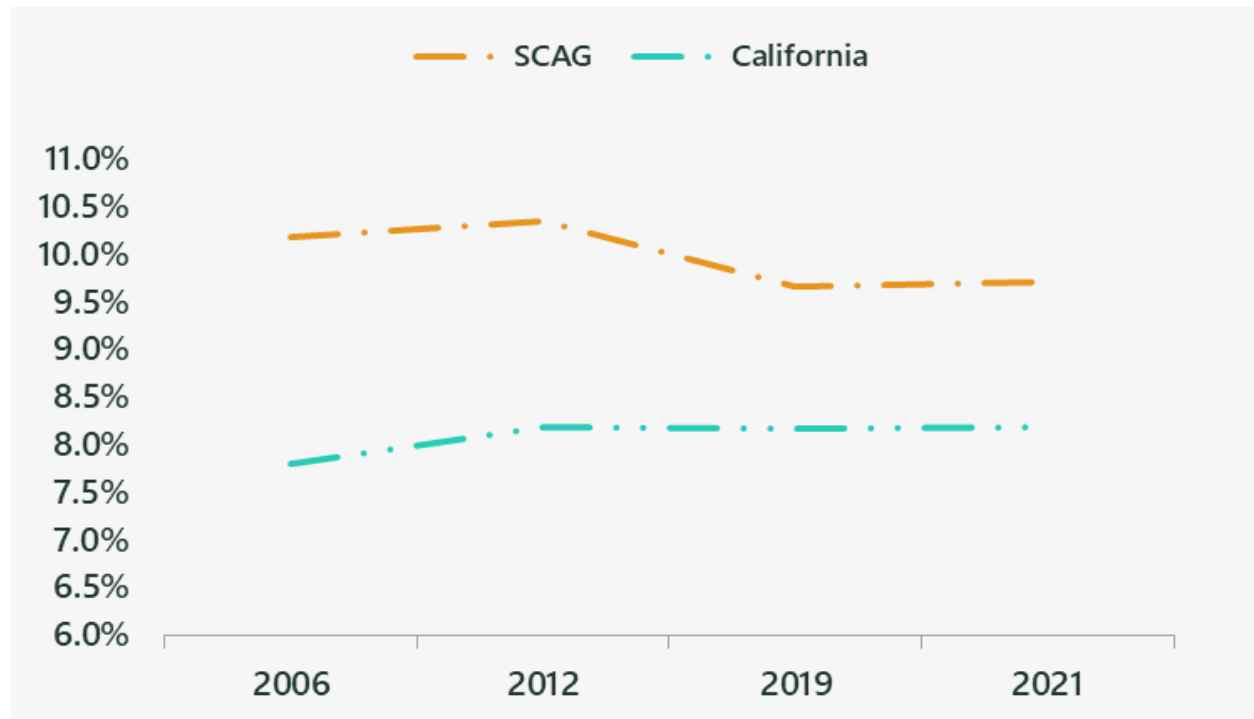
Overcrowding can lead to a variety of challenges in local communities. Many communities experience a large number of unpermitted housing units, such as illegal garage conversions or substandard housing construction. These units can pose health and safety risks to the surrounding community, as they increase the risk of poor sanitation, fire hazards, and other dangerous conditions. These issues can be difficult to mitigate without addressing its root cause – the need for more housing options that are affordable.

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. Since 2012, these percentages have slightly decreased.



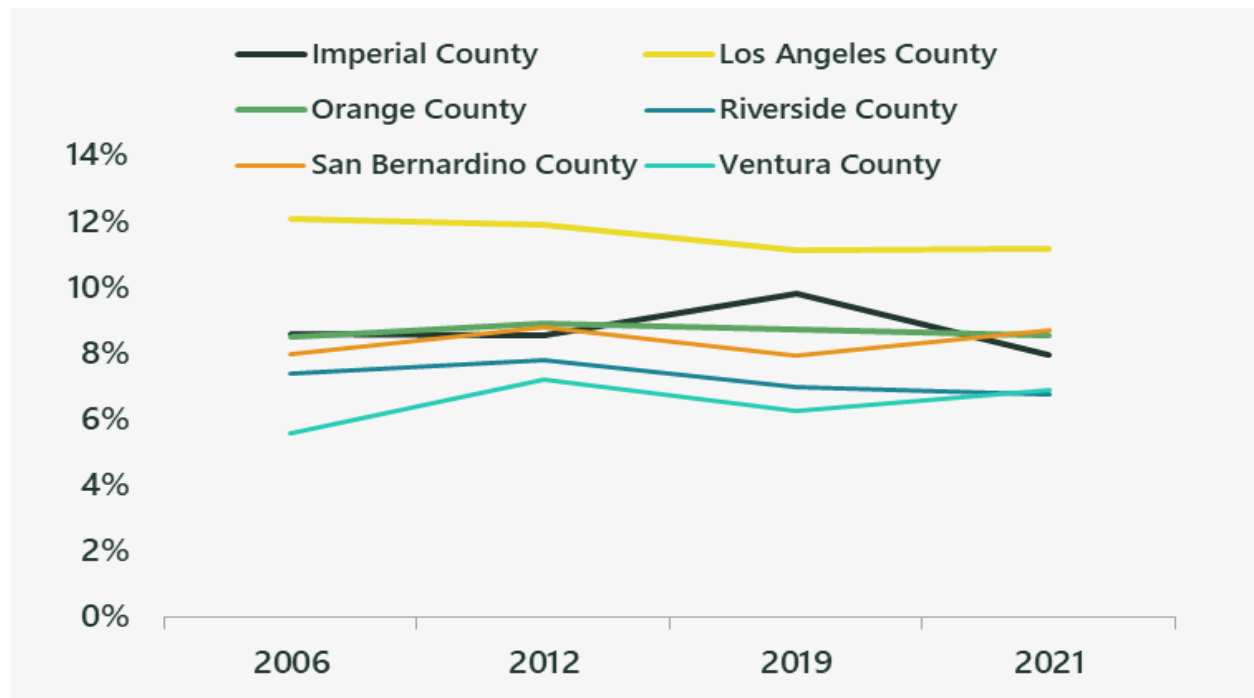
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Figure 12. California and SCAG Region Total Overcrowding Percentage



Source: U.S. Census Bureau 2006, 2012, 2019, and 2021 American Community Survey (1-Year Estimates) Table A10028

Figure 13. SCAG Counties Total Overcrowding Percentage



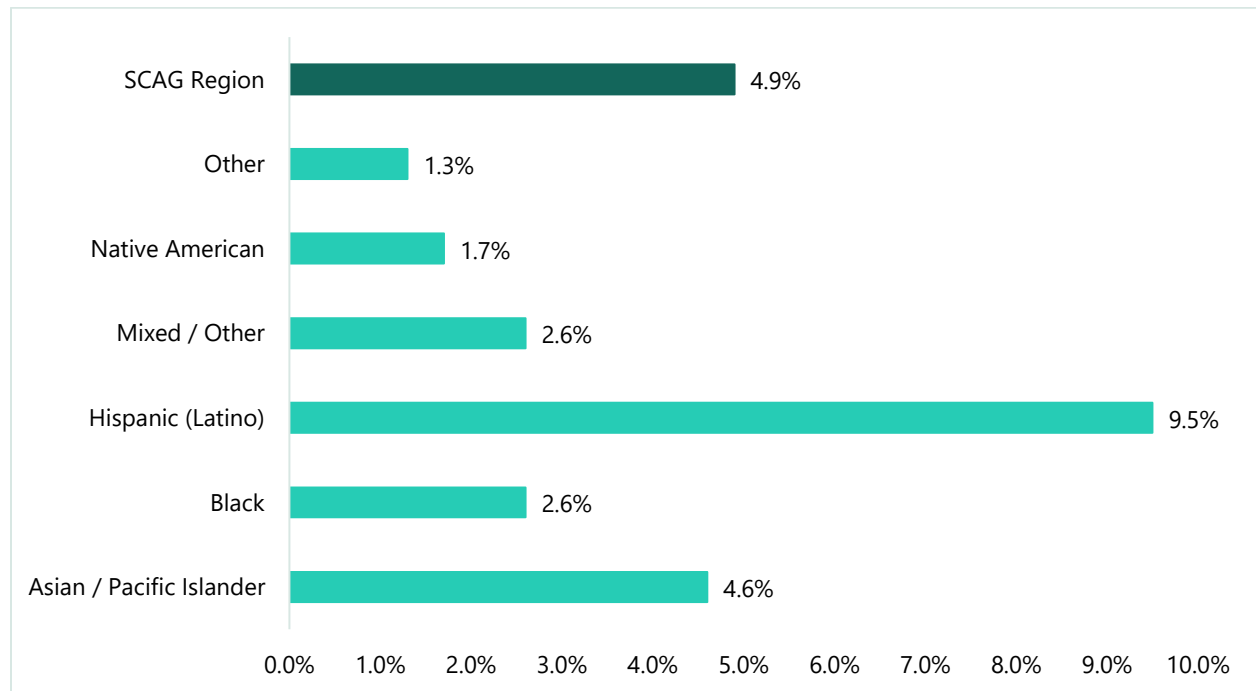
Source: U.S. Census Bureau 2006, 2012, 2019, and 2021 American Community Survey (1-Year Estimates) Table A10028

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For overcrowded units that have between 1.01 and 1.49 persons per room, overcrowding fell by 5.1 percent between 2012 and 2021 in the SCAG region. However, a more dire picture is illustrated when comparing this statistic to severe overcrowding, defined as more than 1.50 persons per room. Between 2012 and 2021, the rate of severe overcrowding within the SCAG region increased by 9.47 percent, with Ventura County and Imperial County seeing jumps by 26.1 percent and 39.4 percent, respectively. This geographical disparity highlights the need to support housing policy and production throughout the region including agricultural and rural areas, not just in urban infill locations.

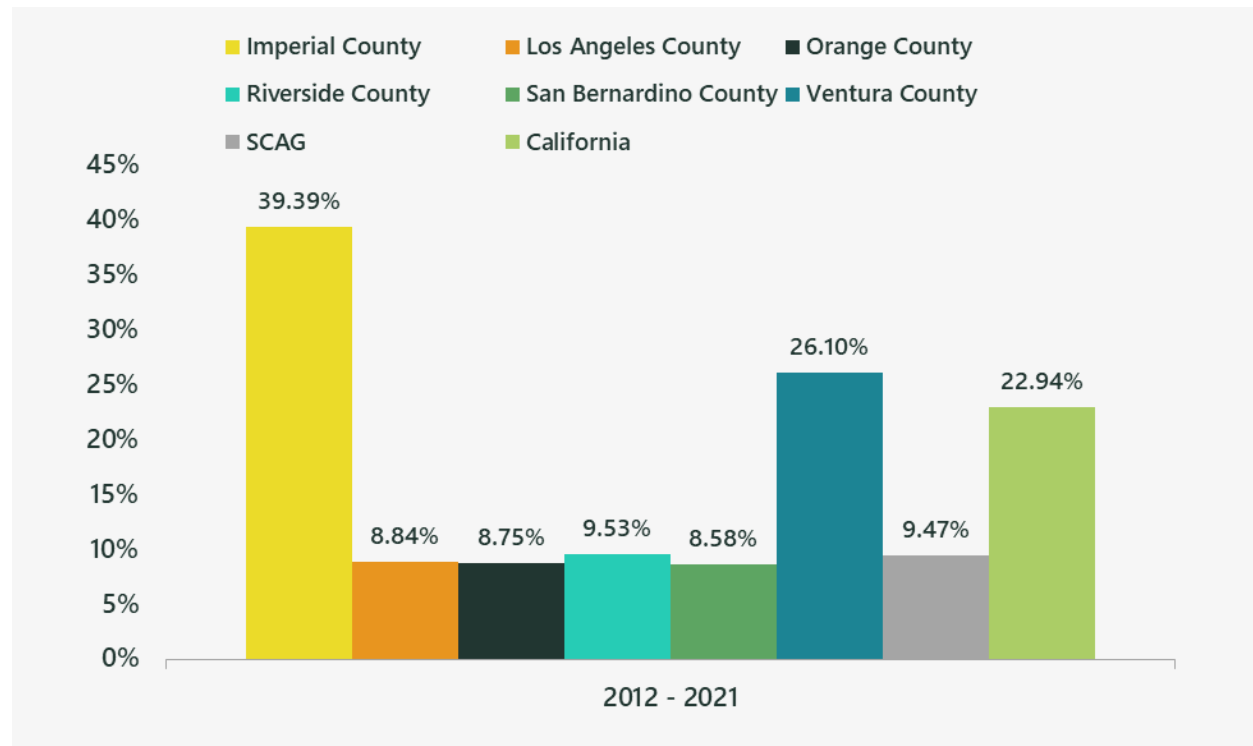
Similar to other data on existing conditions shared in this chapter, communities of color represent a disproportionate amount of the SCAG region's overcrowding data. Across the region, there is a much higher likelihood for Hispanic (Latino) households to be living in overcrowded housing with approximately one out of 10 in overcrowded conditions at 10 percent, while White households have a rate of about one out of 100 (1 percent). While lower than Hispanic (Latino) households, Black and Asian/Pacific Islander households also have higher overcrowding rates at 3 percent and 4 percent, respectively.<sup>8</sup>

**Figure 14. Severe Overcrowding by Race and Ethnicity**



Source: U.S. Census Bureau American Community Survey (ACS) Public Use Microdata Sample (PUMS) 2017-2021

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**Figure 15. SCAG Region Severe Overcrowding Percentage Change 2012 - 2021**

Source: U.S. Census Bureau 2012 and 2021 American Community Survey (1-Year Estimates) Table A10028

## 4.6 DISPLACEMENT PRESSURES

A shortage of housing supply combined with market forces can lead to displacement pressures in areas with at-risk communities, such as those with a high concentration of lower income households and already experience housing conditions such as overcrowding and cost-burden. 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. Housing prices and rents increase further out of reach for existing residents.

This neighborhood change of an initially lower socioeconomic status transitioning to one of higher socioeconomic status, also known as gentrification, is considered as a precursor to rising housing costs and displacement. Additional market forces, including speculation, attract additional attention to these communities, further exacerbating the pressure of displacement, particularly if housing production is insufficient to meet the increase in housing demand. A 2019 study conducted by the UC Berkeley Urban Displacement Project and the California Housing Partnership titled "Rising Housing Costs and Re-Segregation in the San Francisco Bay Area" found that a 30 percent tract-level increase of median rent in the San Francisco Bay Area was associated with a 28 percent decrease in low-income households of color. The same study noted there was no significant relationship between rent increases and losses of low-income White households.<sup>9</sup>

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. While public investments are crucial to improving the livability of a

## Connect SoCal | Housing Technical Report

neighborhood and revitalizing historically disinvested places, such investments can cause unintended consequences of driving market speculation, drawing individuals with higher resources and placing greater pressures on existing residents. Depending on where these displaced households move to, this also has implications for segregation and access to opportunity. An additional consideration around displacement is the erosion of existing and established communities with deep social ties. In addition, displacement pressures are not solely a housing phenomenon but can also impact small business and cultural institutions. However, for the purposes of this Technical Report, the emphasis is on housing.

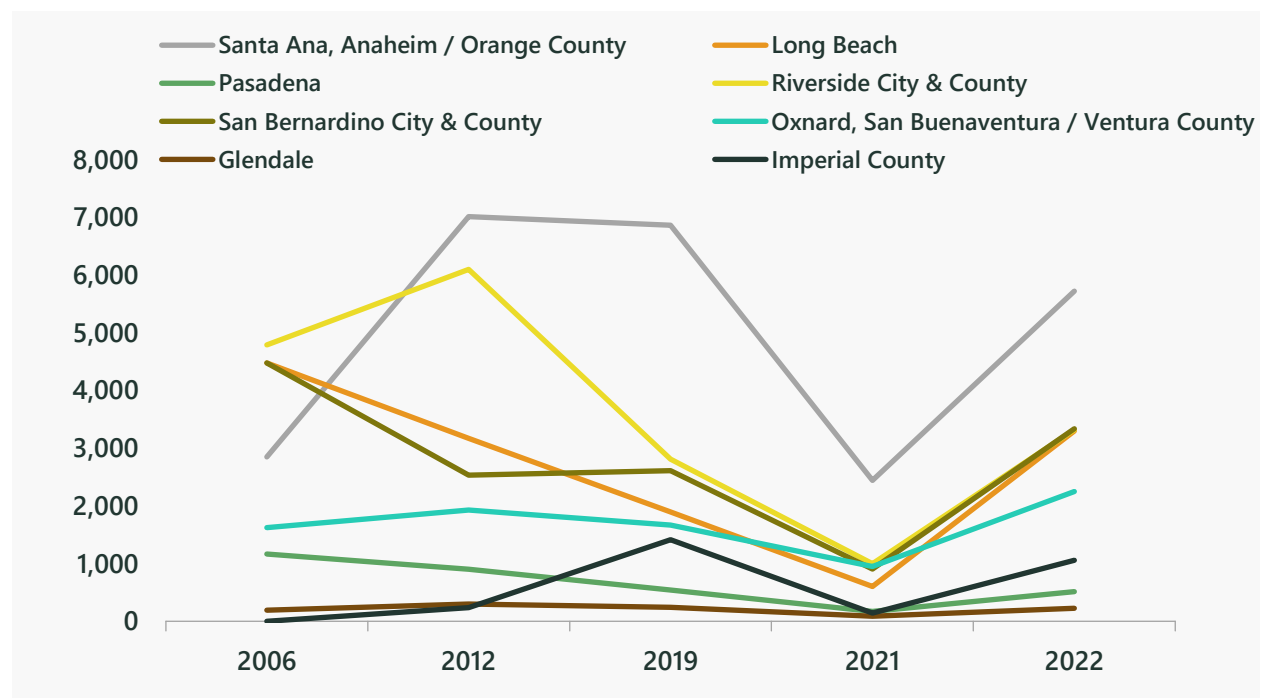
It is crucial to note that neighborhood change does not automatically cause displacement. More housing is needed to accommodate both its existing and new residents. Without adding more housing in these vulnerable communities, the existing residents may be ultimately forced out due to the cumulative displacement pressures – contributing to regional inequities.

## 4.7 HOMELESSNESS

People who are experiencing homelessness are those who do not have a physical address or place to live. People experience homelessness due to a variety of issues including poverty, mental illness, eroding work opportunities, and domestic violence.<sup>10</sup> Homelessness is a pressing issue in the SCAG region, given the magnitude of cost-burdened and low-income households.

While the RHNA allocation for jurisdictions does not include units for the unhoused, jurisdictions are still required to designate zoning or sites for emergency shelters and have zoning in place to accommodate transitional shelters and similar types of housing. Data on homelessness suggest that the pandemic had a significant effect on homeless or unhoused populations.

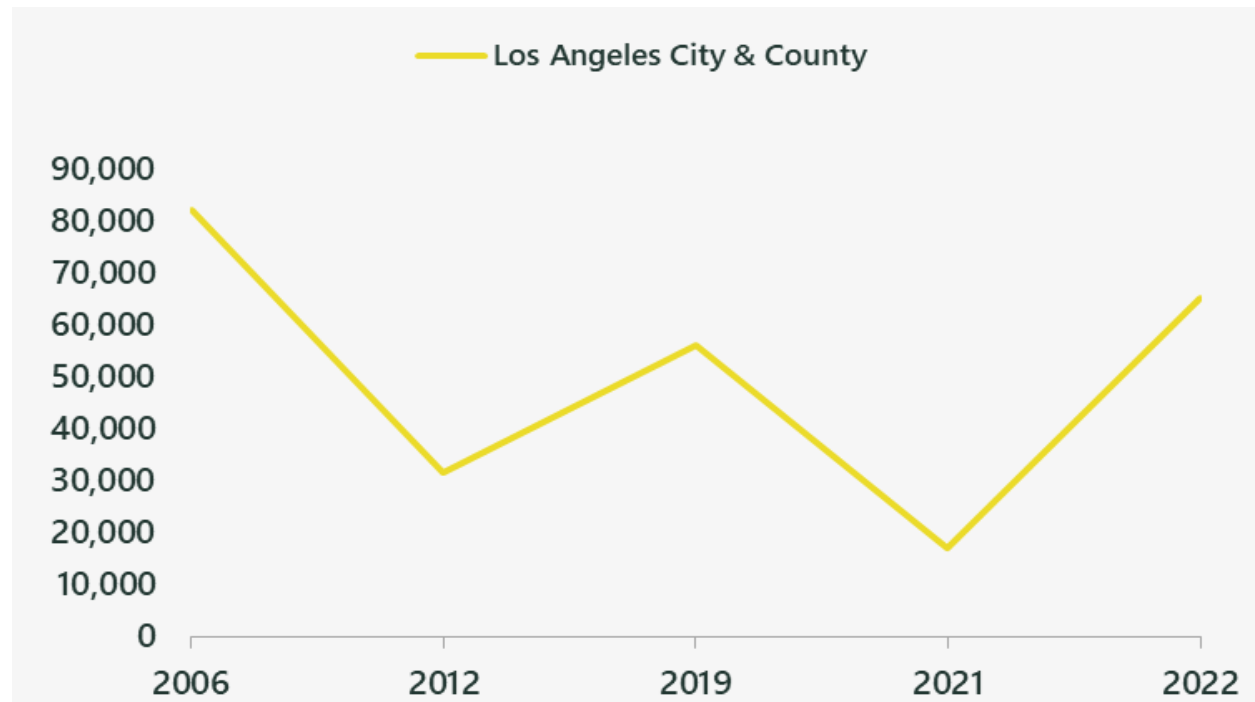
**Figure 16. Overall Homelessness**



Source: U.S. Department of Housing and Urban Development Continuum of Care Housing Inventory Count (HIC) and Point-in-Time (PIT) Report

## Connect SoCal | Housing Technical Report

Figure 17. Overall Homelessness – Los Angeles



Source: U.S. Department of Housing and Urban Development Continuum of Care Housing Inventory Count (HIC) and Point-in-Time (PIT) Report 2006, 2012, 2021, 2022

According to California Continuums of Care (COC), the unhoused population count for CoCs across the SCAG region were 53,729 in 2012 and jumped by 38 percent to over 74,000 in 2019. However, in 2021 the count dropped significantly to less than 23,000 and jumped to almost 85,000 in 2022, meaning that the unhoused population jumped by 58 percent in the last decade. The reason for the 2021 fluctuation may be caused by undercounting due to the pandemic.

Emergency shelters and transitional shelters are only temporary solutions to housing unhoused populations. Long-term solutions to end homelessness require additional affordable housing units that are not currently reflected in a jurisdiction's RHNA allocation. However, if local housing production does not meet housing need, homelessness will continue to pose a significant problem in the SCAG region.

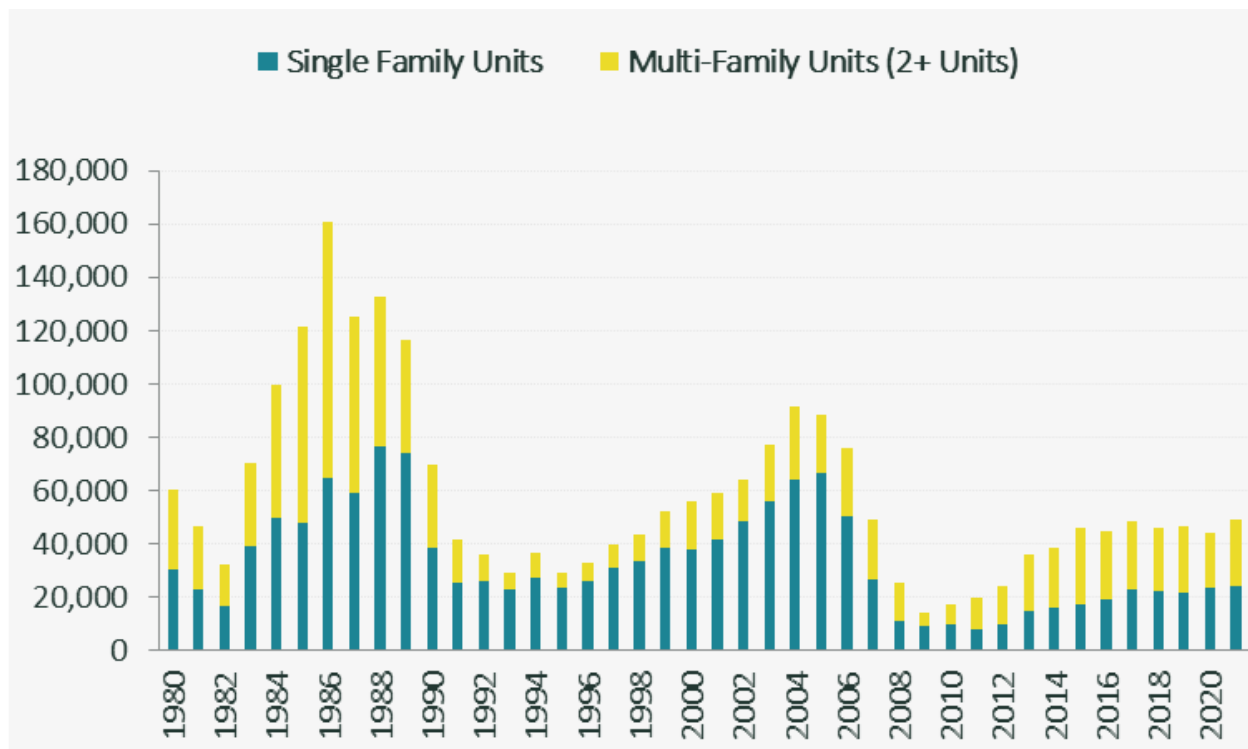
## 5. HOUSING PRODUCTION

Increasing housing production can meet decades of unmet housing demand. However, this is a simplistic approach that does not consider the nuances of housing production activity. To develop effective strategies to address housing need, especially for historically disadvantaged communities, it is crucial to look at what types of housing are being produced and for whom.

### 5.1 PERMITS ISSUED

Between 1980 and 2022, the SCAG region experienced several periods of high building activity and low building activity. In 1986, at the peak of the past four decades, over 160,000 permits were issued for single- and multi-family units in the SCAG region. In contrast, only 14,000 units were permitted at its lowest point in 2009, during the peak of the most recent housing recession.

Figure 18. SCAG Region Building Permits Issued



Source: State of the Cities Data Systems (SOCDS), HUD

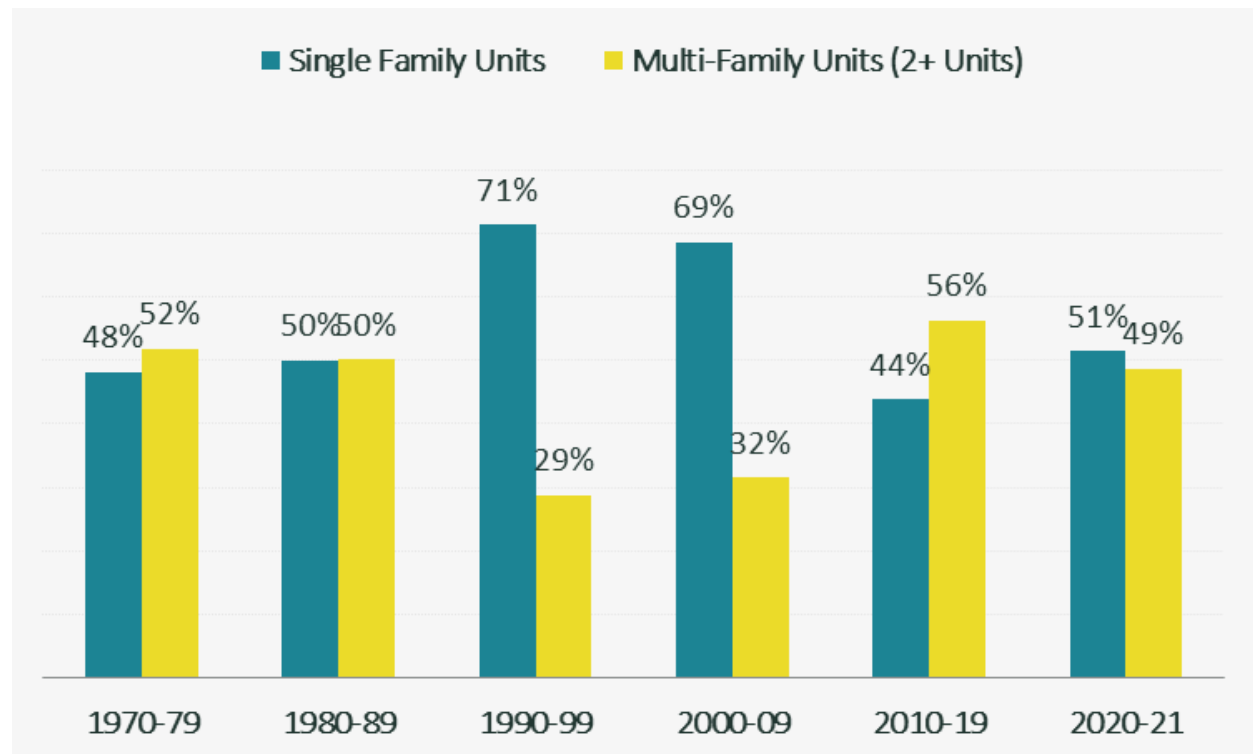
The share of total permits by housing type also fluctuated over the past four decades. Between 1980 and 1989, single-family and multi-family permits represented 49.9 and 50.1 percent of all building permits, respectively. However, between 1990 and 1999, single-family permits represented 71.3 percent while multi-family permits dropped to 28.7 percent. While this trend slightly flipped back to 51.4 percent for single-family permits, the 2020s again reflect most building permits as single-family at 51.4 percent.

To support a diverse population, housing types must also be diverse. Single-family units may be out of reach for many low-income households, but if that type of housing dominates production, what can result

## Connect SoCal | Housing Technical Report

is either cost-burdened households, overcrowded households, or both. By 2050, Connect SoCal 2024 projects the average household size to drop from 2.99 to 2.63 persons, suggesting an increased demand for smaller units. In addition, producing a diversity of housing types through more compact development, such as multi-family dwellings, townhomes, condominiums, and tiny homes, can also promote housing development in a wide range of community contexts and can further Connect SoCal objectives.

Figure 19. SCAG Region Building Permits Issued Percentage

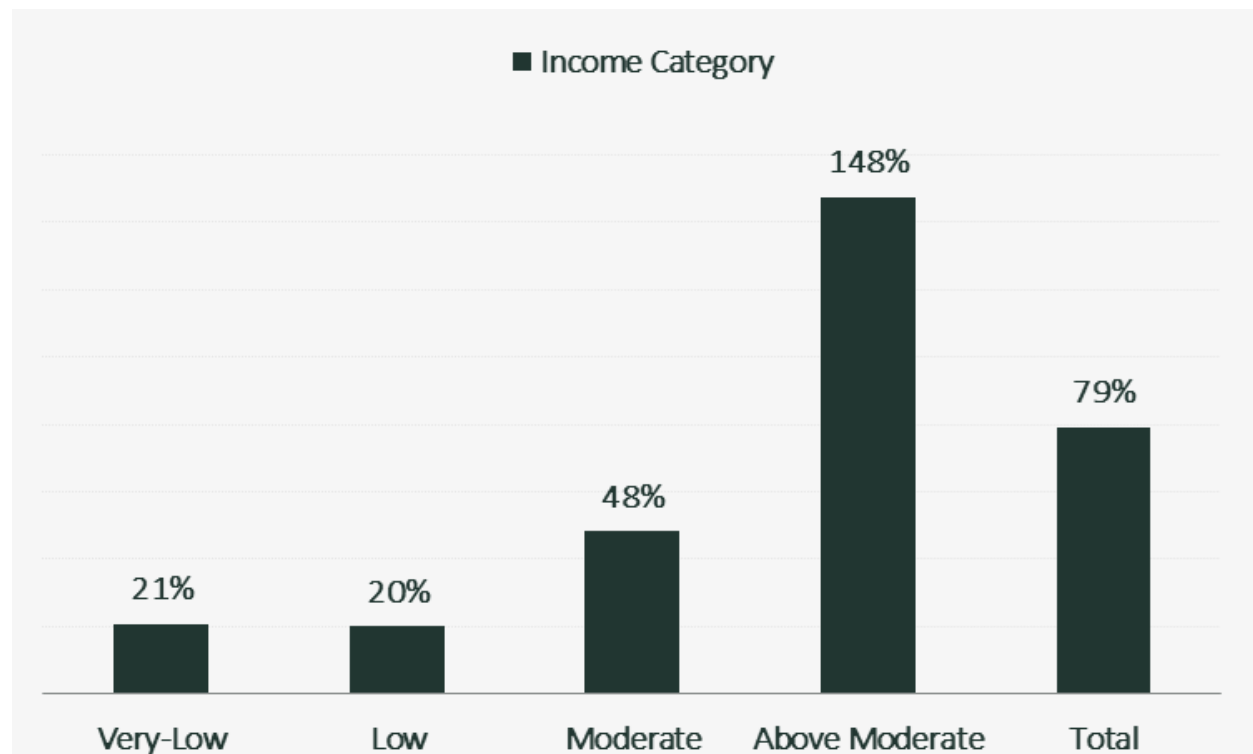


Source: State of the Cities Data Systems (SOCDS), HUD

Annual permit data reported by jurisdictions to HCD illustrated a similar trend for residential permitting activity for the 5th RHNA planning cycle, which covered the years 2013-2021. During this period, 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.

## Connect SoCal | Housing Technical Report

Figure 20. SCAG Region 5th Cycle RHNA Category Fulfillment Percentage



Source: California State Department of Housing and Community Development (HCD)

Jurisdictions met over 147 percent of their above moderate, also known as market rate, RHNA allocation. In contrast, the region met only 48 percent of its moderate-income need and approximately 20 percent of its very low and low, also known as affordable, need. In other words, the region did not meet the needs of 80 percent of its low-income households and barely half of its moderate-income need. While other indicators suggest that over the past couple of years there has been some improvement in cost-burden and overcrowded households, meeting affordable housing need has been a challenge as indicated by permits issued. If this trend continues into the 6th cycle, the existing need of lower income households will perpetually increase into the 7th RHNA cycle and beyond. For lower-income households in an environment saturated with market rate housing, cost burden will only increase, or overcrowding will only worsen, or both.

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. To consider appropriate and effective action, one must first analyze the challenges in meeting housing need.

## 5.2 CHALLENGES IN MEETING HOUSING NEED

There are numerous challenges jurisdictions, developers, and builders face in meeting housing need. Some challenges have been historical and cumulative over decades while other challenges are more recent.



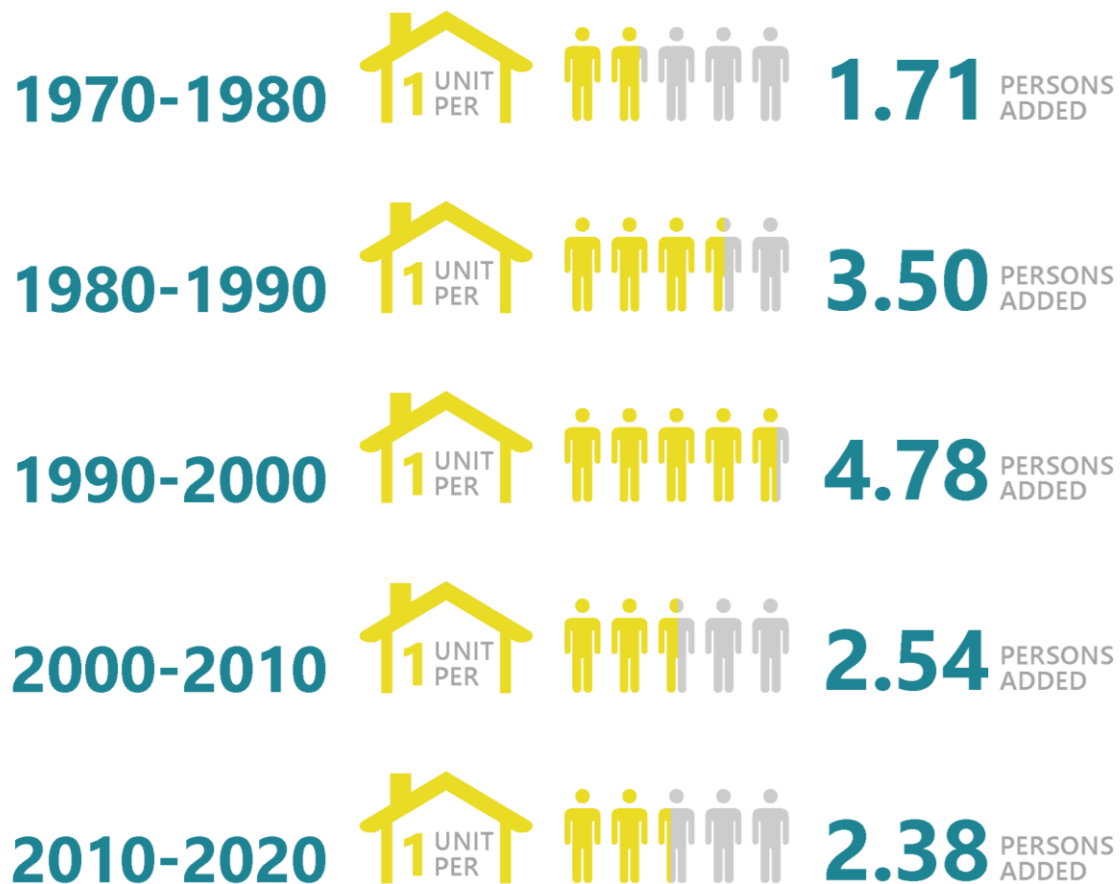
## Connect SoCal | Housing Technical Report

## 5.2.1 PLANNING

## NEED IS HIGHER

As evidenced by a regional RHNA allocation more than three times as high as the prior cycle, both existing and future housing needs continue to climb.

Figure 21. SCAG Region Units vs. Population Comparison



Source: U.S. Census 1970; U.S. Census 1980; California Department of Finance Population and Housing Estimates

Five decades ago, the SCAG region produced 1 new housing unit for every 1.7 persons added to the population. By the 1990s, the ratio decreased to 1 new unit for every 4.8 persons added. While the ratio has steadily increased over the past two decades, this indicator suggests the region was not building enough units over previous decades.

Exacerbating the cumulative housing shortage is the loss of housing designated for low-income households. Many homes designated as affordable for low-income households are reserved for these households for a certain number of years, often up to 55 years, to be eligible for subsidies under governmental programs for building or operating costs. At the end of the reservation period, the units are eligible to change from low-income to market rate housing, putting them "at risk" of losing a valuable

## Connect SoCal | Housing Technical Report

source of affordable housing. In the SCAG region, there are over 167,000 units that are deed-restricted to remain affordable to low-income households. Of these, approximately 17,000 units will have their affordability expire by the end of the 6th cycle planning period in 2029 unless their covenants are renewed.

### COVID URGENT PRIORITIES

The COVID-19 pandemic and the corresponding economic fallout exacerbated the housing crisis and, for communities of color, widened the economic gap. Employment loss, particularly for low-income households, resulted in a growing number of households falling behind on their mortgage or rent. As described in a statement from researcher Jung Hyun Choi of the Urban Institute, rising home prices, rents, and interest rates resulting from this period will disproportionately harm households of color, widening the racial homeownership and wealth gap. In response to these unforeseen challenges, local, State, and Federal policymakers prioritized urgent pandemic needs and directed resources accordingly. A 2021 report from the Consumer Financial Protection Bureau titled "Housing insecurity and the COVID-19 pandemic" finds that while **immediate responses such as mortgage relief policies and foreclosure and eviction moratoria have had a beneficial impact on households at risk for displacement, housing priorities shifted away from those that increased housing supply and focused more on the urgent needs of the pandemic.**<sup>11</sup>

### HOUSING ELEMENT REQUIREMENTS STRICTER

Jurisdictions are required to update their housing elements every RHNA cycle and identify and analyze sites that can accommodate its allocated housing need. Theoretically, a site may be reused in a future housing element provided that it is still available for residential development. The jurisdiction is required to adopt the housing element and receive approval from HCD that it is in compliance with State housing law. Having a compliant housing element allows a jurisdiction to receive housing-supportive grants, which can help the jurisdiction implement its housing element resulting in an increase in housing.

Over the past few years, the laws and requirements for housing element compliance have become stricter compared to prior cycles. New requirements for the sites inventory require that, if certain factors apply, such as whether the site was used in a prior housing element, the availability of utility infrastructure, and considerations for affirmatively furthering fair housing (AFFH), the jurisdiction conduct an additional comprehensive analysis for that site or disallow that site to be considered altogether.<sup>12</sup>

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.

### LOCATION

The historical development trajectory of Southern California, especially during the significant expansion during the 20th century, has been one of housing growth further and further toward the urban fringe. 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. As a result,

## Connect SoCal | Housing Technical Report

there has been an increase in infill development and a higher share of new housing consisting of multifamily housing in existing communities since the Great Recession.

As such, the region today is locationally constrained. While remaining land along the urban fringe is usually less expensive, it requires infrastructure such as roads, sidewalks, municipal sewer systems, and other utility connections of which costs can be passed on to future residents through development impact fees or other mechanisms. The combined cost of housing and transportation can also be higher—especially considering the value of time spent traveling—since workplaces, non-work destinations, and regional amenities are likely to be further. Accessibility to support networks and social services is an important consideration for affordable housing location in particular.

Conversely, the per-acre cost of land in infill or developed areas is likely higher and the time and cost of addressing additional issues such as parcel assembly, environmental remediation, and developing community support are added challenges. The Connect SoCal 2024 Forecasted Regional Development Pattern uses a combination of Priority Development Areas (PDAs), Green Region Resource Areas (GRRAs), and local review through the Local Data Exchange (LDX) process to build a vision of where Southern California can grow which satisfies housing, transportation, and sustainability objectives. A more detailed description is found in the Land Use and Communities Technical Report.

### 5.2.2 BUILDING

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 and environmental requirements can also add cost to the process.

#### COST OF CONSTRUCTION

##### Cost of Land

The Turner Center's 2020 *The Cost of Building Housing Series* notes that between 2000 and 2016, land pricing in the United States climbed by 76 percent, almost twice the rate of inflation.<sup>13</sup> This figure is more pronounced in coastal and infill areas, where there is higher demand for land. In Los Angeles, for example, prices tripled over the same period.

##### Supply Chain / Cost of Materials

The National Association of Home Builders' 2022 *Building Material Prices Continued Climb in July* notes that the price for various construction materials such as concrete, softwood lumber, gypsum building products, and steel mill products significantly increased in the past few years, with a surge of 35.7 percent between January 2020 and July 2022, not seasonally adjusted. This surge includes an 80 percent increase between January 2021 and July 2022, not seasonally adjusted. Some materials also reported the largest historical increases and highest historical prices in 2021.<sup>14</sup>

##### Cost of Labor / Labor Shortage

Labor challenges in the past few years have also added to the cost of construction as reported in CBRE's 2022 U.S. Construction Cost Trends. Issues such as a smaller workforce pool after the last recession, an aging workforce where one in five workers is currently over 55, and strong competition from related

## Connect SoCal | Housing Technical Report

industries have affected the industry and are expected to persist for the near term. As demand for housing construction continues to increase, the cost of labor will also continue to increase.<sup>15</sup>

Table 2. California Cost Construction Annual Percentage Change

	2019	2020	2021	2022
Percentage Change (year-ending)	3.60%	2.80%	13.40%	9.30%

Source: California Cost Construction Index

The California Construction Cost Index, which includes the cost of materials and labor using the San Francisco and Los Angeles markets, indicated that the cost of construction increased by 13.4 percent in 2021 and 9.3 percent in 2022. These jumps are a stark contrast to increases of less than 4 percent in 2019 and 2020.

### Lack of Funding or Complex Funding

According to Urban Institute's 2016 *How affordable housing gets built*, non-market rate residential projects almost always require subsidies to build. A lender will loan money for housing development based on a property's expected income, but when rents are set to affordable levels, there is a shortfall between the loans available and the cost of development.<sup>16</sup> Developers must then leverage other sources of funding to finance the cost of their project.

The subsidies available for affordable housing development are complex. Most affordable housing financing deals involve a mortgage, tax credits, and two or three other sources of funding. In some cases, developers can rely on upward of 20 financing sources to fund their project. Sources can include the low-income housing tax credit (LIHTC), federal block grants such as the Community Development Block Grant program (CDBG), local trust funds, or local property tax relief. The Urban Institute's 2016 *How affordable housing gets built* found that these funds often run on different timelines and require different applications, which can cause delay and potentially stop the project.<sup>17</sup> To make matters worse, the funding sources may not be consistent in scope or amount year to year, making it risky to anticipate future funding, as stated in the Coachella Valley Housing Coalition's *Finding Solutions to the Affordable Housing Shortage*.<sup>18</sup> It is not unheard of for a project to take up to a decade to navigate through the red tape and assemble sufficient funding to complete the project.<sup>19</sup>

A limited number of subsidies combined with a growing demand for affordable housing created a highly competitive environment for affordable housing developers. In recent years, some funding sources declined awards to qualified projects due to an oversubscription of available funding (Nguyen, C., Carroll, J., and Nious, K. (2021). *Why California Can't Build Affordable Housing*).<sup>20</sup> Some funding sources also require or prioritize projects that are "shovel-ready," which can add considerable delay for projects that are still cobbling together funding sources.

### Jurisdictional Processes

On the municipal side of housing production, there are a number of challenges that add barriers to increasing housing supply. While jurisdictions do not usually construct housing, they create the environment that encourages (or discourages) housing development.

## Connect SoCal | Housing Technical Report

### Permitting

The permitting and entitlement process can extend development timelines and are often unpredictable, adding to the cost of development. Common constraints include lengthy processing time, unclear procedures, layered reviews, multiple discretionary review requirements, and costly conditions of approval.<sup>21</sup>

### Local Zoning and Parking Requirements

As part of the permitting process, a jurisdiction will require a residential development to be consistent with its local zoning. A jurisdiction's local zoning will indicate how a parcel may and may not be used, and will include development standards on density, height limits, floor area ratios, and other constraints. A project cannot receive approval if found inconsistent with local zoning unless it receives a variance or other concession from the jurisdiction. Affordable housing may require higher densities than the zoning code allows to meet the cost of the project. The Turner Center's 2014 study titled "The Cost of Building Housing Series" found that local government design requirements for affordable housing added an average of seven percent in total costs.<sup>22</sup> A developer may need to lower the density and find funding to meet a higher cost, or – if unable make the project financially feasible – abandon the project altogether.

Parking requirements are another zoning requirement that can result in a barrier to housing production. Parking minimums set by a jurisdiction add significant costs to a project and removes land that could potentially be used for additional housing. The average cost of garage parking in California is \$23,000 per space (Friedman, L. and Shoup, D. (2021) *Cities Need Housing. Parking Requirements Make it Harder*).<sup>23</sup> In a high-density infill area such as downtown Los Angeles, parking usually costs developers more than \$50,000 per space to build (Manville, M. (2021) *How Parking Destroys Cities*).<sup>24</sup> Similar to requirements such as maximum densities, if a developer does not receive a variance or other concession, a minimum parking requirement will require higher costs for the developer or require the developer to abandon the project altogether.

### Insufficient Resources

Many jurisdictions promote housing, including affordable housing, within their communities. However, municipalities do not always have enough staffing or funding to be able to implement programs and design their zoning codes and fee schedules to encourage housing production. Streamlining permitting processes and reforming local development and zoning standards may take resources that the jurisdiction does not currently have, representing another barrier to local housing production.

### CEQA

Another challenge encountered in encouraging housing production is the California Environmental Quality Act (CEQA). The Center for Jobs & the Economy found in their 2020 study titled "Anti-Housing CEQA Lawsuits Filed in 2020 Challenge Nearly 50 percent of California's Annual Housing Production" that there were 47,999 housing units, nearly half of the State's average annual housing production in prior years, that were targeted in CEQA lawsuits.<sup>25</sup> The uncertainty of the approval process, which includes CEQA-related findings, and potential delays caused by CEQA-related litigation, can add costs to projects, both market rate and affordable.

## COMMUNITY OPPOSITION

Public hearings and meetings allow for stakeholders and residents to participate in the local zoning and project approval process. However, proposed additional housing, particularly affordable housing, is sometimes met with opposition due to the perspective that increasing housing translates to higher densities that affect quality of life, increase traffic congestion, and lower property values. Much of this opposition may be based on misinformation. If enough stakeholders voice opposition to their local elected officials, the project might require a change to its plans such as a reduction of units or not receive approval at all.

## FISCALIZATION OF LAND USE

In 1978, California passed Proposition 13, which limits the amount of tax on a property to a fixed percentage of its base year value. Prior to this, property tax could be cyclically adjusted on the property's assessed value by local governments to fund local services. After Proposition 13's passage, many local governments began to examine the fiscal benefits yielded by different types of zoning and land uses, also known as the "fiscalization of land use".<sup>26 27</sup>

### Housing Seen as a Net Fiscal Loser for Municipalities

On the fiscal side of the housing crisis, increasing housing is not always perceived as financially beneficial to a jurisdiction. The property tax allocation system created to implement Proposition 13 provides many jurisdictions only a small portion of local property tax revenues, and as a result, many jurisdictions are increasingly reliant on other taxes, such as sales and hotel taxes.<sup>28</sup> In addition, while both residents and businesses need government services such as public safety, transportation infrastructure, and utilities, residents also require services such as schools, libraries, and parks. These additional needs coupled with the lack of revenue from sales tax often lead to the perception that zoning for housing would not be fiscally beneficial for a jurisdiction in comparison to zoning for revenue-generating uses.

### Preference for Sales, Hotel, and Utility Tax Generating Uses

In the year before the passage of Proposition 13, local property taxes comprised over 90 percent of jurisdictional tax revenue. Four decades later, that share is less than two-thirds. While jurisdictions can no longer control property tax to meet local funding needs, they have more control over other local taxes, such as sales, hotel, and utility tax provided they receive voter approval. The preference for non-property tax generating uses is apparent in the growth of these taxes in comparison to property taxes. Between 1978 and 2016, property tax revenue (adjusted for inflation) for jurisdictions increased over 100 percent while hotels, sales, and utility taxes increased over 600 percent.<sup>29</sup>

### Development Impact Fees Add to Project Costs (Parks, Utilities, Schools, etc.)

Jurisdictions have the authority to charge new residential projects a wide range of costs such as development and impact fees that are used to support the approval of the development such as staff time for permitting, inspections, and utility connections, which can add substantial cost to a project.<sup>30</sup> It is estimated that development fees represent between 6 and 18 percent of the local median home price, as reported in the Turner Center's 2019 study titled "Residential Impact Fees in California".<sup>31</sup> To recoup these costs, developers may pass them on to the project's future residents. However, in the case of affordable housing where the rents are capped, these fees can widen its funding shortfall.

## Connect SoCal | Housing Technical Report

Local governments appear to be increasingly using development impact fees to pay for costs associated with new residential development. These fees are seen as an alternative to property taxes due to the cap placed on property taxes from Proposition 13. Impact fees can be used to offset the costs of the new development on the wider community, such as street or utility infrastructure expansions due to additional residents. Sometimes impact fees can be used for other public benefits such as park access for set asides for new affordable housing development. In addition, unlike certain types of taxes, impact fees do not require voter approval and jurisdictions only need to explain the connection between the development project and the imposed fees. While these fees will pay for the additional costs associated with the new development, it will result in additional costs to produce housing, adding another barrier of increasing housing supply.

## 6. REGIONAL BEST PRACTICES

As illustrated in previous sections, the causes of the housing crisis are at various points in the process to plan and build housing. Because there is not one singular cause of the crisis, there is not one singular solution, and a range of strategies is needed to address each challenge. 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 various ways to increase housing supply. The local strategies described in this section include the consideration of the location of housing, streamlining the permitting process, preservation of affordable units, and lowering the cost of housing. This section also includes SCAG's long-term housing policies and implementation strategies, setting the stage for SCAG's continuing regional housing program.

### 6.1 FUNDING

Over the past few years, there have been a growing number of funding sources available to jurisdictions, public entities, and developers to plan for and build housing and housing supportive infrastructure. Billions of dollars have been made available through various State grants and funding opportunities for jurisdictions, public agencies, developers, and other eligible applicants. These opportunities can be both competitive and over the counter. Below is a snapshot of some recent major funding opportunities offered by the State that are intended to fund projects and programs to increase housing supply locally and regionally.

#### 6.1.1 SENATE BILL 2

Senate Bill 2, Atkins (SB 2), also referred to as the "Building Homes and Jobs Act", was part of a 15-bill housing package signed by Governor Brown in 2017. The package of bills aimed at addressing California's housing shortage and high housing costs. SB 2 established a \$75 recording fee on real estate documents to increase the supply of affordable homes. In 2018, as a one-time component of SB 2, proceeds from the fee were evenly split between (1) the Planning Grants Program (PGP) and (2) a fund made available to HCD to assist homeless individuals and families. From 2019 onward, SB 2 establishes a permanent source of funding intended to increase the affordable housing stock in California through the Permanent Local Housing Allocation (PHLA) program.

PGP was a non-competitive grants program for cities and counties to update a variety of planning documents and processes that streamline housing approvals and accelerate housing production. In 2019,



## Connect SoCal | Housing Technical Report

HCD released the Notice of Funding Availability (NOFA) for approximately \$123 million, and funds awarded in the SCAG region totaled \$42.4 million out of the \$114.5 million total funds awarded statewide. Note, as Ventura County was grouped in with the Central Coast region, their funds were not counted with the funds awarded to the SCAG region. The grant term ended in June 2022.

SB 2 also established the Permanent Housing Allocation (PHLA). 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. Plans and projects funded by PLHA are intended for households at or below 60 percent of area median income or for homeless individuals and families. Annual PLHA amounts are subject to change because funding for the PLHA is generated through a fee on real estate transactions, which may fluctuate from year to year.

In the past few years, PLHA has made approximately \$466 million available across three NOFA rounds for Entitlement and Non-Entitlement Local governments and included the opportunity to apply for retroactive awards. The total awarded amount statewide was approximately \$241 million, of which 24 SCAG jurisdictions were awarded approximately \$104 million.

### 6.1.2 ASSEMBLY BILL 101 (LEAP, REAP 1.0)

Passed in 2019 as the Governor's housing and homelessness budget trailer bill, Assembly Bill 101 (AB 101) provided \$2.5 billion to address the statewide crisis. Two programs set aside \$250 million as part of a local government planning support grants program: the Local Early Action Plan (LEAP) and the Regional Early Action Planning (REAP) programs.

A total of \$119 million was set aside for LEAP as a formula grant program in which cities and counties are eligible based on population. This program provides over-the-counter grants and technical assistance to local government to prepare and adopt planning documents, process improvements that accelerate housing production, and facilitate compliance with the 6th cycle RHNA. Out of the maximum \$50.8 million in funding available for SCAG region jurisdictions, only \$39.2 million was awarded as not all jurisdictions applied. The final expenditure deadline is December 31, 2024.

The remaining \$119 million were set aside for REAP as a formula program for which councils of governments (COGs) such as SCAG are eligible based on population. The goal of the program is to fund activities through the preparation and implementation of plans and processes that accelerate housing production and help local governments meet their 6th cycle RHNA need. Under this program SCAG was awarded \$47 million.

### 6.1.3 REAP 2.0

The success of the REAP program in 2019 led to the creation of REAP 2.0 with more flexibility and broader goals. REAP 2.0 is a partnership program between the State, its regions, and local entities aimed at meeting the State's housing needs and climate commitments. Of the \$600 million available statewide, \$246 million is dedicated to the SCAG region. All funds must be awarded and encumbered by June 2024 and expended by June 2026. Projects and programs funded under REAP 2.0 must seek to accelerate infill



## Connect SoCal | Housing Technical Report

housing development, reduce Vehicle Miles Traveled (VMT), increase housing supply at all affordability levels, affirmatively further fair housing, and facilitate the implementation of regional and local plans.

### 6.1.4 OTHER GRANTS

#### INFILL INFRASTRUCTURE GRANT

The Infill Infrastructure Grant (IIG) Program provides financial assistance in the form of grants for gap funding for Capital Improvement Projects (CIP) and infrastructure improvements to facilitate affordable and mixed-income housing. This includes the creation, development, or rehabilitation of parks or open spaces, water, sewer or other utility service improvements, streets, roads, or transit linkages or facilities, and facilities that support pedestrian or bicycle transit. Cities, counties, or public housing authorities with certain jurisdictions are eligible to apply. Since 2016, the SCAG region has received over \$191 million out of \$430 million statewide to invest in infrastructure improvements for housing.

#### AFFORDABLE HOUSING AND SUSTAINABLE COMMUNITIES

The Affordable Housing and Sustainable Communities (AHSC) Program is funded by the Greenhouse Gas Reduction Fund (GGRF) which receives Cap-and-Trade auction proceeds. This program provides a combination of grants and loans to achieve greenhouse gas (GHG) emissions reductions and benefit disadvantaged communities. This includes increasing accessibility of affordable housing, employment centers, and key destinations by shortening trip length to reduce VMT and shifting from single occupancy vehicle trips to low-carbon transportation such as taking transit, bicycling, or walking. The most recent NOFA in 2022 made \$750 million in funds available statewide. Projects are eligible for up to \$50 million.

#### LOCAL HOUSING TRUST FUND

The Local Housing Trust Fund (LHTF) provides matching grants to local and regional housing trust funds to create, rehabilitate, or preserve affordable housing, transitional housing, and emergency shelters. Since the program first became available in 2019, over \$37 million was awarded to nine applicants in the SCAG region.

#### SCAG

The increased availability of funding for housing programs from the State, particularly the REAP program, have provided SCAG an opportunity to develop various programs to help local jurisdictions plan for and build housing. Together these programs represent SCAG's regional housing program and are intended to create collective resources for local jurisdictions, developers, community-based organizations, and other stakeholders to plan for and build housing. Many of these programs were launched using SCAG's REAP 1.0 allocation. More information and resources on these programs can be found on SCAG's housing webpage: [www.scag.ca.gov/housing](http://www.scag.ca.gov/housing).

## 6.2 TECHNICAL ASSISTANCE

### 6.2.1 HOUSING ELEMENT PARCEL TOOL (HELPR)

One of the primary components of a local housing element is the identification of sites within a jurisdiction that can accommodate its housing need. To support jurisdictions in preparing their sties inventory, in December 2020, SCAG developed the SCAG Housing Element Parcel Tool (HELPR), an optional web-mapping tool developed to help local jurisdictions and stakeholders understand local land use and site opportunities for aligning housing planning with the State's 6th cycle housing element updates and related guidelines. A HELPR 2.0 was launched in 2021 that added functionality to assess the physical capacity to accommodate accessory dwelling units with user-added assumptions on ADU size, setbacks, and parking requirements.

### 6.2.2 HOUSING SUPPORTIVE GRANT WRITING

As part of its REAP program, SCAG provided direct technical assistance to jurisdictions and Tribal Governments to apply for housing-supportive grants and funding. Jurisdictions and Tribal Governments applied for grant funding for various programs and projects within their communities. Grants included Permanent Local Housing Allocation (PLHA), Infill Infrastructure Grant, Project Homekey, Indian Community Development Block Grant (ICDBG), and Prohousing Designation.

### 6.2.3 OTHER-TO-RESIDENTIAL TOOLKIT

SCAG's Other-to-Residential Toolkit is a unique tool that guides planners and policymakers in facilitating more residential development in their jurisdictions by converting underutilized non-residential, or "other," land uses as opportunity sites for housing. These sites could include gas stations, underused retail commercial, and brownfields. The Toolkit was designed to identify barriers and corresponding solutions, best practices, and implementable actions when reviewing an inventory of non-residential sites that could be candidates for residential development. The Toolkit also provides technical assistance guides for feasibility assessment and strategies to catalyze change.

### 6.2.4 PRESERVATION STRATEGIES

Local efforts to add more housing and improve the quality of life for residents are often accompanied by a need to preserve existing units, particularly those that are affordable. As part of its REAP program, SCAG developed a comprehensive preservation program focused on both current affordable housing with expiring covenants as well as naturally occurring affordable housing (NOAH) at risk of converting to market rate. Preservation of expiring covenants and NOAH is a critical component of a robust Affirmatively Furthering Fair Housing program as it is a powerful anti-displacement strategy. The preservation strategy will include an online cost-benefit calculation tool as part of its technical assistance. As part of its long-term housing policies, SCAG will develop preservation strategies that can be implemented at the regional level.

### 6.2.5 DEVELOPMENT STREAMLINING

As discussed in the prior section, the residential permitting process can represent a barrier to increasing housing production at the local level due to a variety of reasons. To assist jurisdictions and planning and

## Connect SoCal | Housing Technical Report

entitlement practitioners expedite the review and entitlement of housing projects, SCAG created a development streamlining toolkit. This toolkit provides technical assistance and guidance on streamlining approvals under CEQA and facilitating opportunities for jurisdictions to expedite review through their processes and procedures.

The development streamlining toolkit includes a CEQA streamlining resource guide and worksheets, a simplified guide on CEQA exemptions, and an advisory guide to approaches to streamlining local administrative processes. As part of the toolkit's development, SCAG held a series of workshops with jurisdictions and practitioners to share resources on CEQA streamlining and administrative review processes. These educational sessions were recorded and are available for public use on the SCAG housing webpage.

### 6.3 OUTREACH AND EDUCATION

A critical component of SCAG's regional housing strategy is outreach and education. Awareness of the housing issues and information on implementable solutions can empower decisionmakers and the public alike in meaningful discourse and local strategies to address the housing crisis. Periodic webinars and housing forums aim to educate stakeholders and the public on specific housing topics while other strategies, such as the quarterly Housing Working Group (HWG), focus on public participation and feedback on SCAG's programmatic efforts. Additionally, SCAG distributes a monthly housing newsletter to over 500 individuals representing a wide range of groups, communities, and industries to maximize stakeholder connection to regional housing news and issues.

### 6.4 LEGISLATIVE ADVOCACY

In 2017, over one hundred individual bills on housing were proposed by State legislators, a stark contrast to the relative lack of housing-related legislation in the prior years. Since then, housing has become an increasingly important legislative priority as reflected in the number of bills proposed. SCAG has advocated on behalf of its jurisdictions and key groups to support their efforts in planning and implementing housing and its own regional efforts in increasing housing supply and accelerating production. Examples include:

- Extension of Housing Funding Programs such as LEAP and REAP; SB 197 (2022)
- Extension of 6th cycle housing element rezoning-related deadline; SB 197 (2022)
- Housing Finance Trusts; AB 687 (Seyarto, 2021); SB 1444 (Allen, 2022)
- Tools and funding opportunities, such as CEQA streamlining, eligibility for grant funding for adaptive reuse projects, and grants for golf course to housing conversions; SB 7 (Atkins, 2021); SB 10 (Wiener, 2021); AB 1695 (Santiago, 2022); and AB 1910 (Garcia, Christina, 2022)

Regarding State funding support, SCAG also advocated for increased investment in the Infill Infrastructure Grant (IIG), which helps provides jurisdictions the funding needed to build infrastructure that supports infill housing production. SCAG successfully advocated for a \$150 million augmentation to the Governor's original proposal, for a total investment of \$575 million. To support projects in the region, SCAG provided 40 letters of support seeking funding from the programs since 2021 and an additional 10 letters of support for projects applying for the Affordable Housing and Sustainable Communities (AHSC) grant program. SCAG continues to advocate for these programs to prevent budget cuts and seek to increase funding, where possible. At the federal level, SCAG remains committed to protecting vital housing

**Connect SoCal | Housing Technical Report**

programs and tax credits, such as the HOME Investment Partnerships Program, Community Development Block Grants (CDBG), and the Low Income Housing Tax Credit (LIHTC).

## 7. BEST PRACTICES FOR JURISDICTIONS AND STAKEHOLDERS

There are a variety of strategies and tools that local jurisdictions and stakeholders can employ to plan for and build housing. Some of these strategies are centered on planning and creating a supportive environment for housing while others focus on the construction. Although many jurisdictions do not directly build units, they have local land use authority and can focus their efforts on supporting plans and policies that increase and preserve housing. The objective of SCAG's Connect SoCal 2024 and Regional Housing Program is to elevate these strategies and provide resources for local governments to accommodate housing need.

### 7.1 TARGETING PRIORITY DEVELOPMENT AREAS (PDA)

Meeting the housing needs of the region includes considering their location and proximity to priority development areas (PDAs). A more in-depth overview of PDAs can be found in the Land Use and Communities Technical Report. In Connect SoCal 2024, PDAs are areas such as job centers, transit priority areas, neighborhood mobility areas, spheres of influence, and livable corridors where accessibility and mobility options support achieving greenhouse gas emissions reduction. Strategic focus on housing growth and preservation of units in PDAs not only can accommodate additional housing while lowering VMT, but also increases equitable opportunities and affirmatively furthers fair housing.

However, it is crucial to acknowledge that while a large component of the Plan is to focus growth in PDAs, there is still housing need in areas outside PDAs. Rural areas, agricultural areas, and Tribal Lands all have housing needs that would not be met by solely focusing on PDAs. It is important to recognize that communities across the region face housing shortages, each with unique challenges that need to be met in different ways and that while these communities may not be in a PDA, there may be opportunities to address housing needs in a manner that is sustainable and that can result in reduced VMT.

Strategies that address established developed communities outside formally defined PDAs can still promote resilience, equity, and reduction in VMT. For example, the strategy of a "15-minute community", that is defined further in the Land Use and Communities Technical Report, promotes 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.

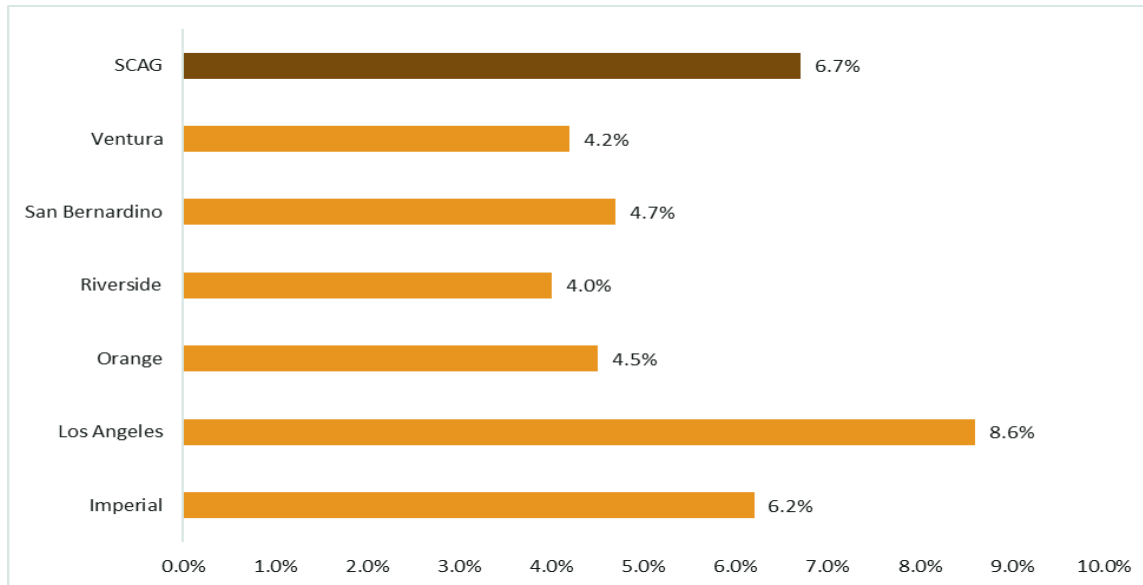
15-minute communities draw social and economic resilience benefits that address shocks and stressors including households with limited mobility options, the age dependency ratio, and limited tree canopy/urban heat island effect.

Households without a vehicle are measured by the percentage of occupied housing units with no vehicles available. In the face of a disaster, communities where fewer households have access to a vehicle exhibit less resilience. Transportation access aids households in supporting their livelihoods and provides critical

## Connect SoCal | Housing Technical Report

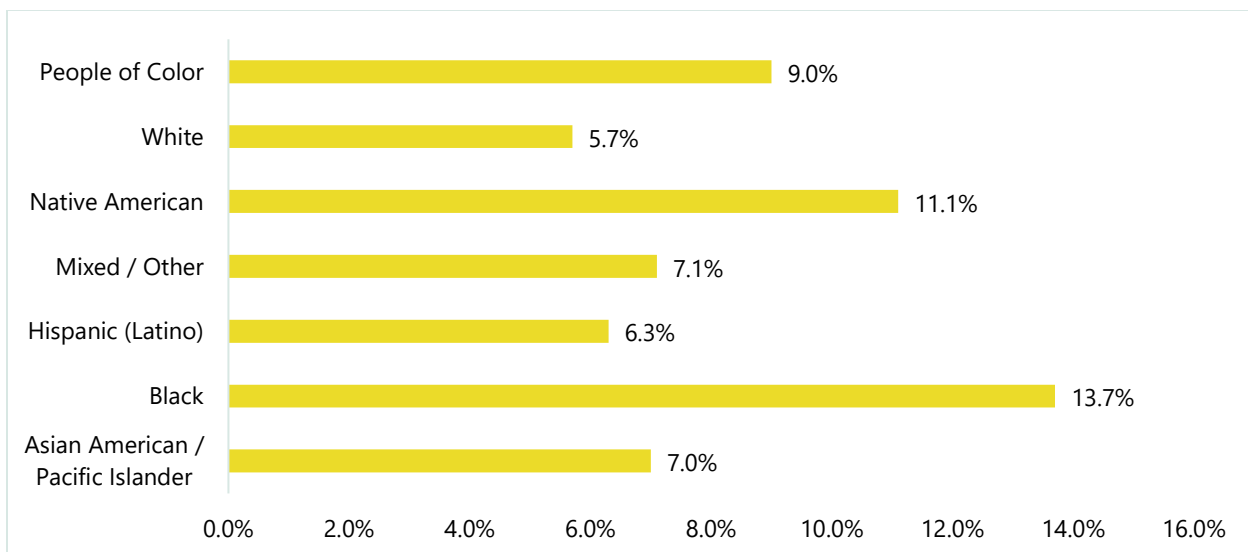
mobility to adapt. Lack of access to a vehicle can be especially problematic for households needing to evacuate in urban areas where automobile ownership is lower, especially among inner city poor populations. Los Angeles County has the highest percentage of households without a vehicle in the SCAG region at 8.6 percent compared to 6.7 percent for the SCAG region overall, followed by the Counties of Imperial at 6.2 percent, San Bernardino at 4.7 percent, Orange at 4.5 percent, Ventura at 4.2 percent, and Riverside at 4.0 percent. Black and Native American households are more likely to not own a vehicle at 13.7 percent and 11.1 percent, respectively, making them more at risk.

**Figure 22. SCAG region Percentage of Households Without a Vehicle**



Source: U.S. Census Bureau American Community Survey (ACS) Public Use Microdata Sample (PUMS) 2017-2021

**Figure 23. SCAG Region Percentage of Households Without a Vehicle by Race and Ethnicity**

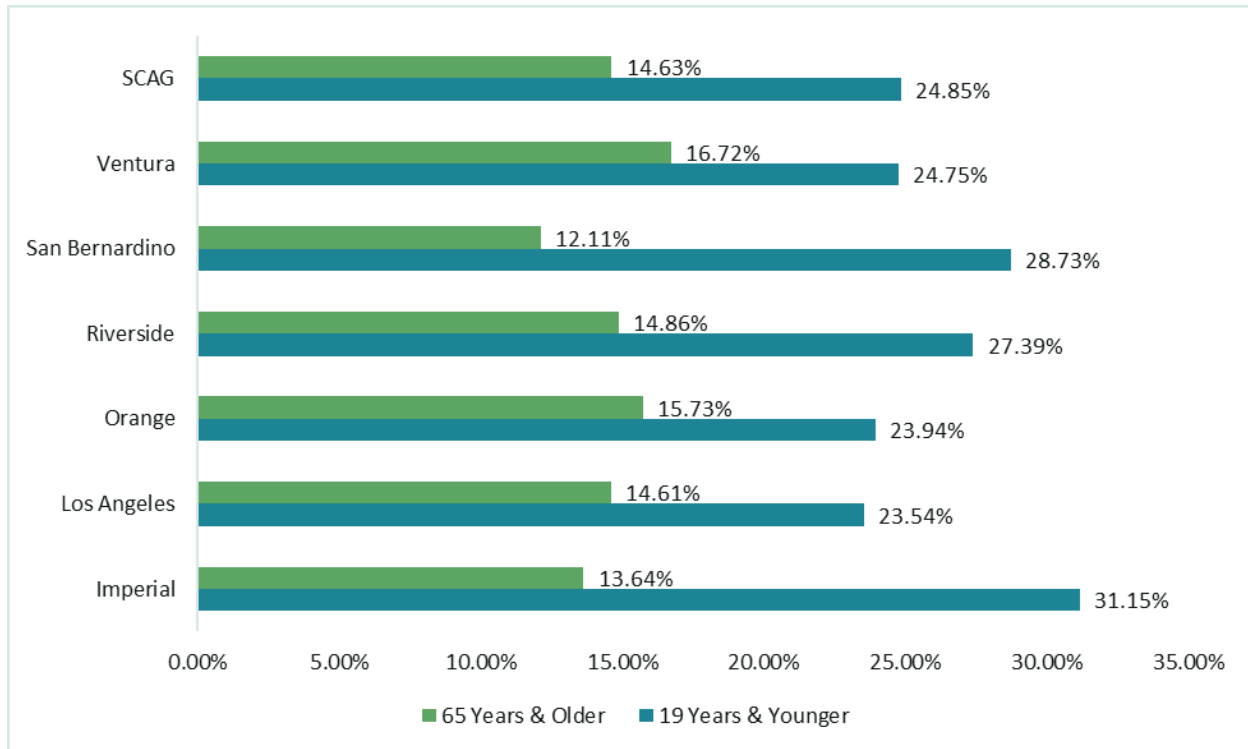


Source: U.S. Census Bureau American Community Survey (ACS) Public Use Microdata Sample (PUMS) 2017-2021

## Connect SoCal | Housing Technical Report

The age dependency ratio is measured by the percentage of the population younger than 20 years old and older than 64. Individuals in this group tend to be less mobile, may find it more difficult to prepare for disasters and to adapt to extreme circumstances, and may require assistance from family, neighbors, and others, which might not be available during a disaster.

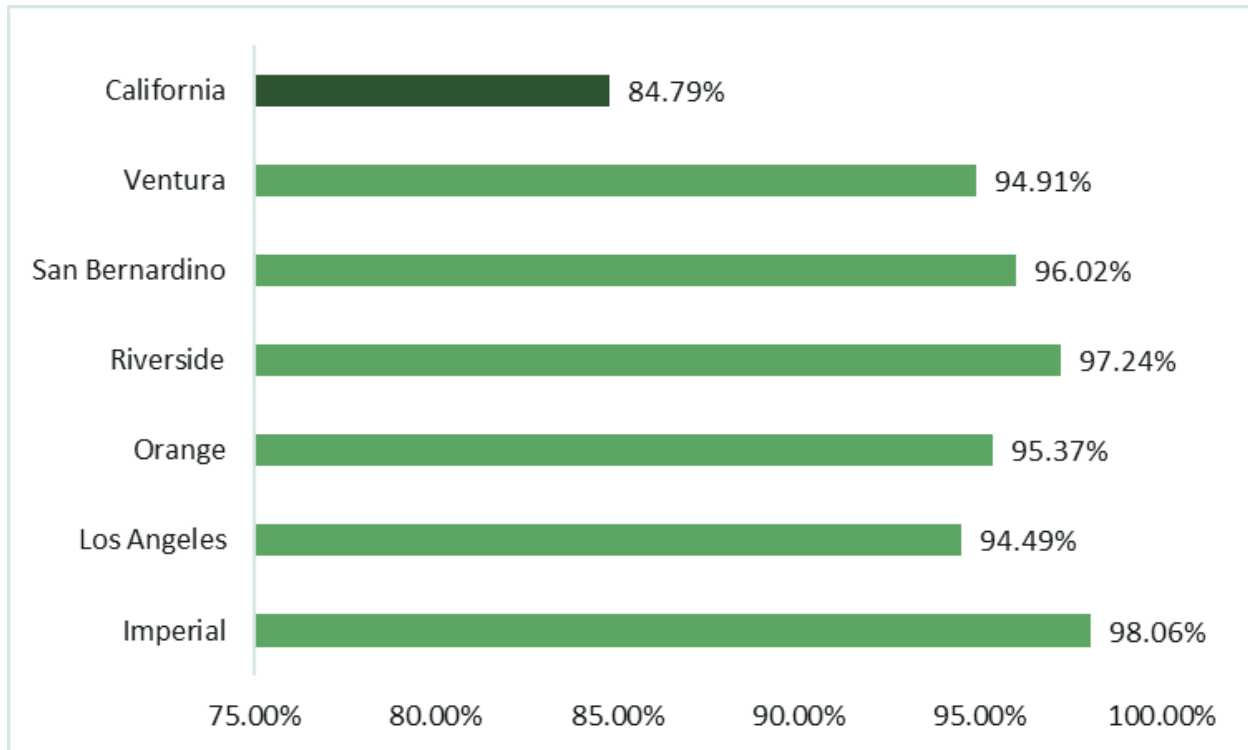
**Figure 24. SCAG Region Percentage of People Less Than 20 Years Old and Greater Than 65 Years**



Source: U.S. Census Bureau 2021 American Community Survey (ACS) 1-Year Estimates Table A01001

Limited tree canopy and the urban heat island effect go hand in hand. Limited tree canopy is measured by the percentage of area not covered by tree canopy. The greater percentage of area not covered by tree canopy, the greater the effects of the urban heat island effect. SCAG counties all have more than 90 percent of the area not covered by tree canopy, at least a 9.7 percent increase than the state of California as a whole. 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. 15-minute communities aim to establish basic day-to-day needs, services, and amenities within a 15-minute walk, roll, or bike from one's home. Part of making 15-minute communities an enjoyable experience is including urban greening that provides shade and beauty. Urban greening is a nature-based solution that not only improves aesthetic appearance, but also helps reduce the fiscal and energy costs of heating and cooling a building.

## Connect SoCal | Housing Technical Report

**Figure 25. SCAG Region Percentage of Area Not Covered by Tree Canopy**

Source: California Department of Public Health

Concentrating residents makes it easier and more affordable to ensure that all have equitable access to higher quality services. 15-minute communities help mitigate shocks and stressors, such as not owning a vehicle, the age dependency ratio, or lack of tree canopy cover, while simultaneously meeting the Plan's goals.

## 7.2 STREAMLINING THE APPROVAL PROCESS

As discussed in Section 5. Housing Production of this report, a lengthy approval process can add significant costs to a project or cause a developer to reduce units or abandon the project altogether. Various strategies are available to help jurisdictions expedite the lengthy permitting process.

Streamlining under CEQA is a process by which an agency can expedite environmental review and approval of a project, such as through an applicable exemption or reliance on previously adopted environmental documents. Traditional CEQA provisions, such as statutory exemptions, categorical exemptions, and limiting the scope of supplemental CEQA documents can reduce the amount of CEQA documentation required to advance approvals and entitlements. Other provisions, such as tiering from prior Environmental Impact Reports (EIR), implementing a specific plan, or streamlining for residential infill projects can avoid unnecessary documentation, prevent redundancy, and promote consistency with environmental documents from prior larger plans.

Improvements to the administrative permitting process can cut down significant time for the building of residential units and indirectly lower the rent or sale price by reducing the developer's project costs. To streamline the permitting process, jurisdictions must first identify where delays exist since inefficiencies



## Connect SoCal | Housing Technical Report

will vary by jurisdiction. 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.<sup>32</sup> A local example of streamlining development to accelerate housing production is the Objective Development Standards project funded by REAP 1.0. Focusing on the Cities of Montebello, Santa Fe Springs, Santa Monica, and South Pasadena, the project centered on accelerating housing production and reducing housing costs through faster permitting and introducing certainty in local design and development standards.

### 7.3 STEWARDSHIP OF FUNDING AND LAND FOR HOUSING

Housing trust funds are dedicated funds that receive ongoing revenues that are used to support affordable housing. These types of funds can be administered by a jurisdiction but can also be administered by a multi-agency organization such as a council of governments or a private nonprofit organization. Dedicated revenues can include housing impact fees, in-lieu fees (in jurisdictions that have an inclusionary zoning ordinance), a share of transient occupancy tax, or contribution funds from major employers. Housing trust funds can provide direct financing or help fill project shortfalls, make low interest loans to developers, provide technical assistance to developers, and preserve and maintain affordable housing. Because they are designed to meet direct local needs and have an ongoing revenue source to do so, administering or having membership in a housing trust fund can be a practical strategy to increase and preserve local housing supply.<sup>33</sup> Under SCAG's REAP 1.0 program, several subregional partners directed some of their subregional project funding toward establishing regional housing trust funds, such as the Gateway Cities Council of Governments and the Westside Cities Council of Governments. Other partners, such as Orange County Council of Governments and the San Gabriel Valley Council of Governments, used program funding to create specific strategies and plans for already established housing trust funds.

Community land trusts (CLT) are a practical strategy to preserve affordable housing in communities facing displacement pressures. They are nonprofit organizations whose primary mission is to steward land property through the use of a ground lease that ensures permanent affordability to its residents.<sup>34</sup> In a traditional CLT model, the nonprofit owns the underlying land while the buildings are owned or leased by residents. This can help address the high cost of land as a barrier to producing housing. Because the mission of the nonprofit organization is to ensure affordability, there are legal provision in place, such as long-term ground lease or a deed covenant, to maintain long-term affordability. Although jurisdictions do not typically administer community land trusts, they can still take action to support local CLTs. These actions include establishing an inventory of surplus properties, prioritizing land purchase proposals that promise lasting affordability, establishing land banks, and incentivizing lasting terms of affordability through inclusionary zoning policies.<sup>35</sup>

Land banks are nonprofit or public authorities that focus on the conversion of vacant and deteriorating properties to productive use, such as for affordable housing. According to the National League of Cities' 2021 *Community Land Trusts: A Guide for Local Governments*, in areas with a strong housing market, land banks can prioritize these properties for acquisition by a CLT, which can result in more accessibility to resource-rich areas and long-term affordability.<sup>36</sup>

## 7.4 HOUSING SUPPORTIVE INFRASTRUCTURE AND UTILITIES

Utility infrastructure, such as electricity, water, and wastewater, is a basic requirement to deliver housing since investments in basic utility infrastructure are a precursor to any housing being entitled and delivered. Utility investments often drive up the cost of housing production, because of the need to upgrade whole systems beyond the scope of a single project to guarantee service, or simply because of the lack of system capacity. This is particularly crucial for infill and affordable housing projects where production costs are a barrier to development. Another consideration is addressing inequitable investments over time, and in particular the fact that lower income and communities of color are often those communities with inadequate infrastructure and less ability to garner additional investment.

While local housing elements must identify any infrastructure and utility barriers to development, addressing these barriers is challenging. In some instances, utilities such as water service are managed directly by a municipality while in others, it is managed by a larger water district. Strategies to address the barriers will depend on the size of the jurisdiction and who manages and administers the utility and corresponding infrastructure. Moreover, many jurisdictions do not have an updated to date assessment of their utility infrastructure location, capacity, and maintenance needs. Potential strategies include re-evaluating development impact fees, increasing infrastructure capacity in key strategic housing elements sites such as historically underserved areas, updating local assessments of utility infrastructure, and pursuing grant opportunities that fund housing-supportive utilities and infrastructure. Primary examples of this work to support local jurisdictions were pursued by several subregional partners under the REAP 1.0 program. They include the San Bernardino Council of Governments Infrastructure Pilot Toolkit, which developed infrastructure strategies to provide a growth capacity plan for areas not served by a special utilities district, and the City of Palmdale Digital Utility Data Inventory for Housing Tool, which was developed to reduce uncertainty associated with planning and constructing housing developments and also assist the City in prioritizing Capital Improvement Projects that improve infrastructure to support new housing development.

In addition to addressing equity, implementing housing supportive infrastructure and utilities addresses resilience by promoting sustainable resource management and climate-ready systems. Climate-ready systems include emergency response centers as well as back up water and power for both residents and critical services in the event of a climate disaster. Backup utility sources may be supplied on the individual, jurisdictional, and/or organizational level such as a community-based organization or local school while back up critical services such as hospitals may be supplied through microgrids or generators. These back up services are critical in improving community resilience and addressing the impacts on housing instability and homelessness that a disaster may have. Low-income residents facing cost burden, the majority of which are people of color, have fewer financial resources and are more susceptible to the harmful effects of climate change.<sup>37</sup> Housing supportive infrastructure and utilities promotes the development of affordable housing and provides relief for low-income residents and the unhoused population in the face of climate disasters. The coordination required among various partners to implement these strategies can ensure that goals are implemented in tandem.

## 7.5 PARTNERSHIPS WITH OTHER AGENCIES

Partnership with other agencies can pool together existing resources and address challenges through multi-prong approaches. SCAG's housing outreach strategy emphasizes communication to elevate conversations to facilitate these partnerships.

## Connect SoCal | Housing Technical Report

Examples of strategic partnerships include:

- Partnering with State and federal agencies, such as HCD, Governor’s Office of Planning and Research (OPR), and HUD to align goals of housing production, affirmatively furthering fair housing, reducing VMT and greenhouse gas emissions, and promoting resilience.
- Participation in local subregional councils of government to create a local housing trust fund.
- Joint projects with county transportation commission to develop affordable housing near transit stations.
- Supporting community land trusts by prioritizing land purchase proposals that promise lasting affordability.
- Promoting work with community-based organizations that engage in grassroots-based outreach with marginalized communities.

## 7.6 ANTI-DISPLACEMENT STRATEGIES AND INCREASING AFFORDABLE HOUSING IN HIGH RESOURCE AREAS

As the SCAG region focuses on infill housing development and new transit investments, there is a growing number of affordable housing units converting to market rate, which can create displacement pressures in areas that have traditionally been home to lower income households and communities of color. These “at-risk” units include units with expiring affordability covenants or are existing rental properties that are affordable without public subsidy to low-income households, also known as Naturally Occurring Affordable Housing (NOAH). Paired with production of affordable housing and tenant protections, preservation of these units is a key component of anti-displacement strategies.

SCAG is developing a series of preservation recommendations that include a cost-benefit calculation tool that can be utilized for NOAH or at-risk properties. The tool includes multiple inputs and outputs that can serve as a general guide to determine the net public benefit of this financing tool on an individual preservation proposal and financial thresholds to consider when determining appropriate financing mechanisms for preservation of at-risk units.

## 7.7 LOWERING THE COST OF HOUSING

As previously discussed, the cost of housing construction can significantly impact housing affordability. Several new trends in housing building can help lower the overall cost of construction.

### 7.7.1 NEW CONSTRUCTION METHODS

Mass timber are engineered wood products made of large structural panels that are small pieces of either lumber or veneer that are adhered together. These create large structural pieces that are used for entire floor or wall panels and can be dropped into place onsite. Due to their strength and fire resistance, which is particularly important due to increased fire risk from climate change, they can be a building alternative to steel and concrete. In 2022, California building codes were updated to allow for the construction of mass timber building up to 18 stories tall.<sup>38</sup>

## 7.7.2 PRE-FABRICATION AND MODULAR HOUSING

Pre-fabrication of structural elements and even entire homes is increasing in popularity as production quality improves and costs of constructing housing onsite increase. Manufactured homes, which are also known as mobile homes, are constructed according to a code administered by the U.S. Department of Housing and Urban Development (HUD) and must be constructed on a permanent chassis. Modular homes, which are a type of prefabricated homes, are constructed to the same state and local building codes as on-site built homes. Modular homes can be constructed as either single-family or multi-family residences.<sup>39</sup>

The cost savings from factory construction promote increased affordability for homeowners and renters through reducing construction costs by building off-site, through cost savings will be greatest at higher levels of scale and production. For manufactured homes, the average price for square foot is less than half of a site-built home. Modular construction could achieve an overall savings of up to 20 percent over traditional construction, including for multi-family housing. Both manufactured and modular homes can be constructed as ADUs, which can increase affordable housing supply in tight markets.<sup>40</sup>

## 8. HOUSING THE REGION: POLICY FRAMEWORK

Even if the SCAG region met its housing needs today, it is still essential to meet the housing needs of tomorrow. Looking toward 2050 and beyond requires us to look at strategies that are regional and collective. These strategies are aligned directly with other SCAG strategies, particularly Land Use, and are intended to complement strategies led by local jurisdictions to increase housing production while promoting equity and affirmatively furthering fair housing.

### 8.1 REGIONAL PLANNING POLICIES

SCAG'S Connect SoCal housing priorities address the complex challenges of the housing crisis and its connection to address historic inequity and patterns of segregation and poverty. These priorities focus on the different aspects of housing production, including location, resources, access, preservation, homeownership, and housing the unhoused.

**Encourage housing development in areas with access to important resources (economic, educational, health, social, and similar) and amenities to further fair housing access and equity across the region.**

A diverse range of housing types addresses the diverse range of needs of the region. Living within the same community are residents living alone, large families, nuclear families, seniors, students, homeless persons, and many others. Each of these living situations have different housing needs and a diversity in housing types and choice can help address the mismatch of housing needs and affordability in communities.

**Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities.**

The location of housing matters just as much as the type of housing. Increasing housing closer to jobs and current and future infrastructure can reduce traffic and greenhouse gas emissions, improve accessibility, and promote equity. Walkable neighborhoods emphasize accessibility by encouraging a community that meets the needs of its residents without having to leave it.

## Connect SoCal | Housing Technical Report

### Support local, regional, State, and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region.

The production and preservation of affordable housing is a critical part of addressing the housing shortage. Policies across all levels of government can support the preservation and production of affordable housing.

### Prioritize communities that are vulnerable to displacement pressures by supporting community stabilization and increasing access to housing that meets the needs of the region.

Historical segregation patterns cannot be addressed without prioritizing the inequitable results of displacement on vulnerable communities. Increasing housing, especially affordable housing, in our region's most impacted areas can help address historic inequities while addressing the overall housing crisis.

### Promote innovative strategies and partnerships to increase homeownership opportunities across the region with an emphasis on communities who have been historically impacted by redlining and other systemic barriers to homeownership for people of color and other marginalized groups.

Homeownership, particularly for people of color and other marginalized groups, can foster long term community building. In communities that have been historically impacted by redlining and other systemic barriers to homeownership, increasing access to homeownership can help stabilize the community and its cultural institutions.

### Advocate for and support programs that emphasize reducing housing cost burden (for renters and homeowners), with a focus on the communities with the greatest need and vulnerabilities.

Housing cost burden for renters and homeowners can impact a household's quality of life and expose households to financial vulnerability. This is exacerbated in communities facing displacement pressures, particularly for low-income communities of color. Advocating and supporting programs that reduce cost burden for all households can help stabilize communities and minimize displacement.

### Support efforts to increase housing and services for people experiencing homelessness across the region.

Historically, planning for permanent housing units at the regional and local levels has not focused on the unhoused population, let alone the services to support them. Supporting efforts to increase housing and services for people experiencing homelessness is critical to addressing the housing crisis.

## 8.2 IMPLEMENTATION STRATEGIES

While SCAG does not have local land use decision-making authority, it can partner with and support local jurisdictions and stakeholders to encourage and promote effective and equitable strategies that increase housing at the local level.

- Provide technical assistance for jurisdictions to complete and implement their housing elements and support local governments and Tribal Entities to advance housing production.

## Connect SoCal | Housing Technical Report

- Identify and pursue partnerships at the local, regional, state, and federal level to align utility, transit, and infrastructure investments with housing development and equitable outcomes across the region.
- Identify innovative homeownership models that can reduce costs and increase housing production in the region and identify strategies to engage households of color and communities that are underrepresented as homeowners.
- Develop and deploy community stabilization (anti-displacement) resources that can be utilized to address displacement pressures, such as preservation and tenant protections, for communities across the region and Affirmatively Further Fair Housing.

## 9. CONCLUSION

There is a not one-size-fits-all approach to the housing crisis and addressing its challenges requires the implementation of short- and long-term strategies, along with implementation at the local, regional, and State levels. The accumulation of a housing shortfall decades in the making combined with historical patterns of segregation create a challenging task in ending the crisis. Connect SoCal 2024 helps provide a unifying vision for the future wherein housing targets can be achieved alongside transportation and sustainability objectives, as well as providing an opportunity to remedy past under-supply and current underhousing and historical segregation patterns. At the regional level in SCAG's Connect SoCal 2024, this requires taking the first step – to make housing matter.

## 10. REFERENCES

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- <sup>1</sup> Terry Gross (2017). "A 'Forgotten History' Of How the U.S. Government Segregated America." <https://www.npr.org/2017/05/03/526655831/a-forgotten-history-of-how-the-u-s-government-segregated-america>.
- <sup>2</sup> Kelly Simpson. "The Great Migration: Creating a Black New Identity in Los Angeles." KCET, 2021. <https://www.kcet.org/history-society/the-greatmigration-creating-a-new-black-identity-in-los-angeles>
- <sup>3</sup> Kelly Simpson. "A Southern California Dream Deferred: Racial Covenants in Los Angeles." KCET, 2012 <https://www.kcet.org/history-society/a-southern-california-dream-deferred-racial-covenants-in-los-angeles>.
- <sup>4</sup> Elina Shatkin. "The Ugly, Violent Clearing of Chavez Ravine Before It Was Home to the Dodgers." LAist, 2018. [https://laist.com/2018/10/17/dodger\\_stadium\\_chavez\\_ravine\\_battle.php](https://laist.com/2018/10/17/dodger_stadium_chavez_ravine_battle.php).
- <sup>5</sup> California Office of Planning and Research. "General Plan Guidelines, Chapter 4: Required Elements" [https://opr.ca.gov/docs/OPR\\_C4\\_final.pdf](https://opr.ca.gov/docs/OPR_C4_final.pdf).
- <sup>6</sup> SCAG (2022). *Racial Equity Baseline Conditions Report*. [https://scag.ca.gov/sites/main/files/file-attachments/2022racialequitybaselineconditionsreport\\_final.pdf](https://scag.ca.gov/sites/main/files/file-attachments/2022racialequitybaselineconditionsreport_final.pdf).
- <sup>7</sup> Ibid.
- <sup>8</sup> Ibid.
- <sup>9</sup> UC Berkeley's Urban Displacement Project and the California Housing Partnership (2019). *Rising Housing Costs and Re-Segregation in the San Francisco Bay Area*. [https://www.urbandisplacement.org/wp-content/uploads/2021/08/bay\\_area\\_re-segregation\\_rising\\_housing\\_costs\\_report\\_2019.pdf](https://www.urbandisplacement.org/wp-content/uploads/2021/08/bay_area_re-segregation_rising_housing_costs_report_2019.pdf).
- <sup>10</sup> National Coalition for the Homeless (2007). *Why Are People Homeless?* <http://nationalhomeless.org/publications/facts/Why.pdf>.
- <sup>11</sup> Consumer Financial Protection Bureau (2021). *Housing insecurity and the COVID-19 pandemic*. [https://files.consumerfinance.gov/f/documents/cfpb\\_Housing\\_insecurity\\_and\\_the\\_COVID-19\\_pandemic.pdf](https://files.consumerfinance.gov/f/documents/cfpb_Housing_insecurity_and_the_COVID-19_pandemic.pdf).
- <sup>12</sup> California Department of Housing and Community Development (2020). *Housing Element Site Inventory Guidebook*. [https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites\\_inventory\\_memo\\_final06102020.pdf](https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf).
- <sup>13</sup> Turner Center (2020). *The Cost of Building Housing Series*. <https://turnercenter.berkeley.edu/research-and-policy/the-cost-of-building-housing-series/>.
- <sup>14</sup> National Association of Home Builders (2022). *Building Material Prices Continued Climb in July*. <https://www.nahb.org/blog/2022/08/building-material-prices-continue-to-climb-in-july>.
- <sup>15</sup> CBRE (2022). *2022 U.S. Construction Cost Trends*. [https://www.cbre.com/insights/books/2022-us-construction-cost-trends?utm\\_source=press-release&utm\\_medium=pub&utm\\_campaign=awareness\\_investmentintelligence\\_united\\_states\\_national\\_construction\\_cost\\_guide\\_2022\\_8\\_24&utm\\_content=08%2f24%2f2022](https://www.cbre.com/insights/books/2022-us-construction-cost-trends?utm_source=press-release&utm_medium=pub&utm_campaign=awareness_investmentintelligence_united_states_national_construction_cost_guide_2022_8_24&utm_content=08%2f24%2f2022).
- <sup>16</sup> Urban Institute (2016). *How affordable housing gets built*. <https://www.urban.org/urban-wire/how-affordable-housing-gets-built>.
- <sup>17</sup> Ibid.
- <sup>18</sup> Coachella Valley Housing Coalition. *Finding Solutions to the Affordable Housing Shortage*. <https://www.cvhc.org/finding-solutions-to-the-affordable-housing-shortage/>.



## Connect SoCal | Housing Technical Report

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- <sup>19</sup> Nguyen, C., Carroll, J., Nious, K. (2021). *Why California Can't Build Affordable Housing*. <https://www.nbcbayarea.com/investigations/why-california-cant-build-affordable-housing/2605587/>.
- <sup>20</sup> Ibid.
- <sup>21</sup> California Department of Housing and Community Development. *Processing and Permitting Procedures*. <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/processing-and-permitting-procedures>.
- <sup>22</sup> Turner Center (2020). *The Cost of Building Housing Series*. <https://turnercenter.berkeley.edu/research-and-policy/the-cost-of-building-housing-series/>.
- <sup>23</sup> Friedman, L. and Shoup, D. (2021). *Cities Need Housing. Parking Requirements Make It Harder*. <https://www.bloomberg.com/news/articles/2021-04-26/to-save-the-planet-kill-minimum-parking-mandates>.
- <sup>24</sup> Manville, M. (2021). *How Parking Destroys Cities*. <https://www.theatlantic.com/ideas/archive/2021/05/parking-drives-housing-prices/618910/>.
- <sup>25</sup> Center for Jobs & the Economy (2022). *Anti-Housing CEQA Lawsuits Filed in 2020 Challenge Nearly 50% of California's Annual Housing Production*. <https://centerforjobs.org/wp-content/uploads/Full-CEQA-Guest-Report.pdf>.
- <sup>26</sup> California State Board of Equalization (2018). *California Property Tax*. <https://www.boe.ca.gov/proptaxes/pdf/pub29.pdf>.
- <sup>27</sup> Legislative Analyst's Office (2016). *Common Claims About Proposition 13*. <https://www.lao.ca.gov/reports/2016/3497/common-claims-prop13-091916.pdf>.
- <sup>28</sup> Ibid.
- <sup>29</sup> Ibid.
- <sup>30</sup> Turner Center (2020). *The Cost of Building Housing Series*. <https://turnercenter.berkeley.edu/research-and-policy/the-cost-of-building-housing-series/>.
- <sup>31</sup> Ibid.
- <sup>32</sup> Local Housing Solutions. *Streamlined permitting processes*. <https://localhousingsolutions.org/housing-policy-library/streamlined-permitting-processes/>.
- <sup>33</sup> Institute for Local Government (2007). *Establishing a Local Housing Trust Fund*. [https://www.ca-ilg.org/sites/main/files/file-attachments/resources\\_Local\\_Housing\\_Trust\\_Fund\\_0.pdf](https://www.ca-ilg.org/sites/main/files/file-attachments/resources_Local_Housing_Trust_Fund_0.pdf).
- <sup>34</sup> California Community Land Trust Network. <https://www.cacltnetwork.org/california-clt-definition/>.
- <sup>35</sup> National League of Cities (2021). *Community Land Trusts: A Guide for Local Governments*. [https://www.nlc.org/wp-content/uploads/2021/08/Community-Land-Trusts\\_A-Guide-for-Local-Governments\\_Report-1.pdf](https://www.nlc.org/wp-content/uploads/2021/08/Community-Land-Trusts_A-Guide-for-Local-Governments_Report-1.pdf).
- <sup>36</sup> Ibid.
- <sup>37</sup> Lee, T. (2023). *Why cities need to think more about the intersection of housing and climate change*. <https://www.nlc.org/article/2023/04/28/why-cities-need-to-think-more-about-the-intersection-of-housing-and-climate-change/>.
- <sup>38</sup> Haubner, A. (2022). *High-rise mass timber structures cleared for California*. <https://www.cbsnews.com/sacramento/news/high-rise-mass-timber-structures-cleared-for-california/>.
- <sup>39</sup> U.S. Department of Housing and Urban Development's Office of Policy Development and Research (2020). *Factory-Built Housing for Affordability, Efficiency, and Resilience*. <https://www.huduser.gov/portal/periodicals/em/WinterSpring20/highlight1.html>.
- <sup>40</sup> Ibid.







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